Report on the Outcome of the 2025 Spring Hunting Season in Malta

June 2025

Wild Birds Regulation Unit

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1. Introduction

1.1 This report has been prepared in addition to Malta's formal reporting obligation under Article 9 of the Birds Directive. During bilateral discussions with the Commission Services, it was agreed that spring hunting reports are to be submitted within one month from termination of the migration study—a fixed period between 15 March and 15 May—rather than within one month from closure of the spring hunting season. The report provides an overview of the implementation of Malta's spring hunting derogation for European Turtle-dove (*Streptopelia turtur*) and Common Quail (*Coturnix coturnix*) in April 2025, including:

- an overview of the decision-making process leading up to the application of the derogation;
- consideration of the relevant legal and policy parameters;
- consideration of the conservation status of the species concerned;
- an assessment of the outcome of the previous autumn hunting season and an independent assessment of the migratory influx of European Turtle-dove (*Streptopelia turtur)* and Common Quail (*Coturnix coturnix*) during autumn 2024;
- the necessary preparatory measures and regulatory controls effected prior to and during the season;
- an assessment of the migratory influx of Turtle-dove and Quail during the 2025 spring season and bag data;
- the enforcement effort in place to ensure the strict supervision of hunting during the 2025 season;
- disclosed offences and corresponding enforcement action taken; and
- the legal and other management aspects of relevance.

2. Legal and policy basis for the application of a derogation permitting spring hunting of Turtle-dove and Common Quail in 2025

2.1 A derogation permitting spring hunting in 2025 was applied on the basis of Article 9(1) of Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the Conservation of Wild Birds, which states that "*Member States may derogate from the provisions of Articles 5 to 8* [of the same Directive]*, where there is no other satisfactory solution*" in line with a number of limited reasons, such as that stipulated by Article 9(1)(c): *"to permit, under strictly supervised conditions and on a selective basis, the capture, keeping or other judicious use of certain birds in small numbers*".

2.2 As regards the "no other satisfactory solution" criterion, the judgment delivered by the Court of Justice of the European Union (CJEU)in case C-76/08, explicitly noted that "*hunting for Quail and Turtle-doves during the autumn hunting season cannot be regarded as constituting, in Malta, another satisfactory solution, so that the condition that there be no other satisfactory solution, laid down in Article 9(1) of the Directive, should, in principle, be considered met*".[1]

2.3 This judgment therefore recognises the right to apply a derogation for spring hunting in Malta subject to the strict conditions laid down in Directive 2009/147/EC. Malta's biogeographical circumstances that were recognised by the Court in 2009 have remained the same, and therefore the hunting of Turtle-dove and Quail in spring remained the only satisfactory solution within the meaning of Article 9(1)(c).

[1] Case C-76/08 *Commission v Malta*, ECR I-8213, paragraph 63

2.4 The Conservation of Wild Birds (Framework for Allowing a Derogation Opening a Spring Hunting Season for Turtle-dove and Quail) Regulations (Subsidiary Legislation 549.57 of the Laws of Malta) (Framework Regulations) establish a series of parameters to be considered **prior to** any decision to apply a derogation, particularly the requirement to consider the previous autumn hunting bag data for Turtle-dove and Quail, and to consider the conservation status of the species concerned.

2.5 Consideration of the above two parameters is discussed in the following sections of this report.

3. Consideration by the Malta Ornis Committee

3.1 The Malta Ornis Committee[2], established under Regulation 10 of the Conservation of Wild Birds Regulations (Subsidiary Legislation 549.42 of the Laws of Malta) considered a range of aspects prior to providing a recommendation to the Maltese Government.

3.2 At its sitting on 21 March 2025, the Committee considered an updated assessment of the conservation status of Common Quail. The Committee further discussed the potential application of a spring hunting derogation and as a result of its deliberations, the Committee recommended in principle the application of a hunting derogation for Common Quail in spring 2025 with the same parameters as established in 2022.

3.3 Following the Court degree to dismiss BirdLife Malta's warrant of prohibitory injunction (detailed below), at its sitting of 2 April 2025, the Committee considered the updated assessment of the conservation status of Turtle-dove and discussed the potential application of a spring hunting derogation. The Committee voted in favour of opening a spring hunting season for the Turtle-dove (*Streptopelia turtur*).

3.4 Reports on the assessment of the conservation status of Quail and Turtle-dove are enclosed in Annex 1 to this report and the findings of these assessments are summarised in section 4 of this report.

3.5 A final recommendation to Government on the dates of the season was made, namely, to open the season for Quail from 14 April until 4 May and for Turtle-dove from 21 April until 4 May.

3.6 Following Ornis Committee recommendation the Government opted to open the season for Quail between 14 April and 4 May, inclusive of both dates by virtue of Legal Notice 73 of 2025. The season for Turtle-dove was opened between 21 April until 4 May inclusive of both dates by virtue of Legal Notice 74 of 2025 following the Court's final decree on the warrant of prohibitory injunction described in the below section. The national quota was set at 2,400 Quail and 1,500 Turtle-doves.

Warrant of Prohibitory Injunction

3.7 On 18 March 2025, BirdLife Malta filed a warrant of prohibitory injunction before the Court to stop the Ornis Committee from discussing the spring hunting of Turtle-dove. Consequently, the discussion on the relative Regulations was suspended pending the court decree on the matter.

3.8 A hearing on the merits of the warrant was held on 28 March 2025. On 2 April 2025, the Court dismissed BirdLife Malta's warrant of prohibitory injunction and noted that BirdLife Malta's arguments had failed to meet the legal threshold required for an injunction to be granted and did not show that the opening of a spring hunting season would cause irreparable harm. It also noted that

[2] Minutes of the Ornis Committee meetings are available at: https://wbru.gov.mt/en/the-department/ornis-committee/

the warrant of prohibitory injunction applied for was within the same merit of the warrant of prohibitory injunctions decided upon in the previous years.

4. Consideration of the conservation status of European Turtle-dove and Common Quail

4.1 As was also the case in previous years, prior to further consideration by the Malta Ornis Committee on whether or not to recommend to Government the application of a derogation, the Wild Birds Regulation Unit (WBRU) carried out an assessment of all latest available scientific data pertaining to the population status of the Common Quail (*Coturnix coturnix*) and Turtle-dove (*Streptopelia turtur*). These assessments were presented to the Malta Ornis Committee on 18 March and 2 April 2025 respectively, and the full report is contained in Annex 1 to this report.

Common Quail (*Coturnix coturnix*)

4.2 The EU population status for Common Quail is Unknown, as the data reported were not sufficient to assess the population status of the species (EEA, 2020). The Common Quail has an IUCN Least Concern classification at global level but at European Level it was placed in a higher risk Red List category from Least Concern (2015) to **Near Threatened** (2021) (BirdLife International, 2021: 19). At EU level, the breeding population status is **Unknown** (EEA, 2020). This species is not included in the Pan-European Common Bird Monitoring Scheme.

4.3 During the current (2013–2018) Article 12 reporting period, the Italian population (95% of Malta's reference population) registered an increase in the long-term trend from the previous (2008–2012) status of unknown. However, the Hungarian population now stands at 5,000–10,000 *fewer* calling males than previously reported. **Malta's reference population retained a stable short-term trend status in the maximum number of calling males and improved the short-term trend status in the minimum number of calling males, from declining to stable. The long-term trend of the reference population remains unknown.**

4.4 During the 8th meeting of the Task Force on the Recovery of Birds held on 8 November 2024, the Common Quail was proposed as potential candidate species [high priority] for Adaptive Harvest Management.

European Turtle-dove (*Streptopelia turtur*)

4.5 This species is listed as **Vulnerable** at the European and global levels and **Near Threatened** within the territory of the European Union (BirdLife International, 2015a: 41). A ten-year (2018–2028) international single species action plan is in place *to restore the European Turtle-dove to a favourable population status so that it can be safely removed from the Globally Threatened categories of the IUCN Red List* (Fisher *et al.* 2018).

4.6 The European Bird Census Council (2024 update; 2023 base year) has shown that at Pan-European level, the Turtle-dove **declined by 83%** when compared with the 1980 baseline data and by 16% during the 10-year trend (2014–2023). Compared with the previous EBCC update, the Turtle-dove population did not register any population change in the long-term trend [the -83% decline registered during the previous update was also registered during the latest update] and decreased by 11% in the short-term (10-year) trend [from -5% to -16%].

4.7 The latest (March 2024) technical update presented by the Scientific Advisory Group to NADEG's Task Force on the Recovery of Bird Species notes that the Turtle-dove population in the central-eastern flyway **continues to decline progressively with no sign of potential recovery,**

particularly in recent years. The total loss between 2003 and 2023 has been reported at 480,000 breeding pairs (46% decline). The population has been reported at its lowest during the 2003–2023 time series.

4.8 The majority of Turtle-doves that migrate over Malta breed in Italy (ranging from 61.9% [ring recoveries + geotagging data] to 76.9% [geotagging data only] of the total EU reference population of Malta). Italy's latest Farmland Bird Index (2024) shows that the Turtle-dove population decreased by 21.9% ±1.66% during period 2000–2024. The 10-year (short-term) trend of Italy's Turtle-dove breeding population calculated over the period of the last ten years (2015–2024) is stable, from -8.3% (as calculated by WBRU) to -9.6% (as calculated by BirdLife Malta). Both percentage change should be interpreted with caution since the data compiled by Italy for the Farmland Bird Index does not automatically equate to the Article 12 data for reporting period 2019–2024.

4.9 In the short-term trend, the Turtle-dove minimum breeding population during the last ten years [2015–2024] declined in the region of 11,153–12,466 pairs (MT's EU reference population based on both ring recovery data and geotagging data) and declined in the region of 10,850–11,200 pairs (MT's EU reference population based on geotagging data only). The magnitude change based on geotagging data only is still within the ±10% threshold which equates to a **stable** trend. However, when the ring recovery data is also included in the dataset, although the minimum change is -9.55% (**stable**), the maximum change is -10.68% (**decreasing**).

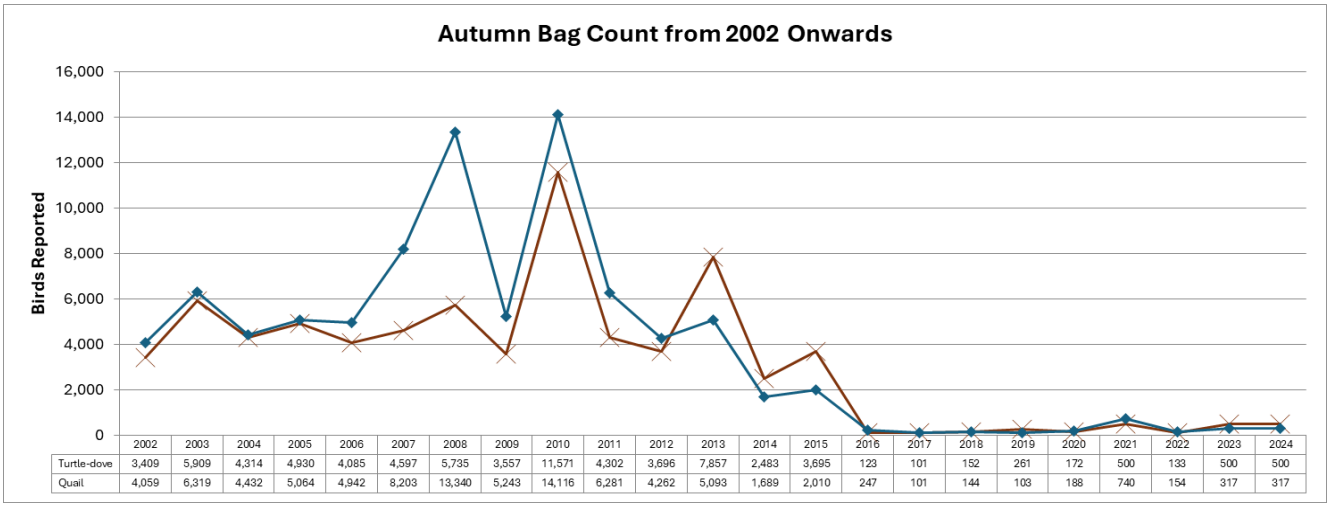
4.10 This update has shown that if the **-21.9% decline** reported in Italy's latest Farmland Bird Index (2024) for period 2000–2024[3] had to be considered as the magnitude change of this species in the long-term trend category (in lieu of the magnitude change for period 1993–2024, which will only be available once Italy's Article 12 report for period 2019-2024 will be reviewed and published by the European Environment Agency in mid-2026), the overall **long-term trend** magnitude change of Malta's EU reference population would range from a minimum magnitude change of -19.31% (**stable, borderline decreasing**) to max. magnitude change of -20.68% (**decreasing**) [ring recoveries + geotagging data] and, based solely on geotagging data, from a minimum magnitude change of -19.61% (**stable, borderline decreasing**) to max. magnitude change of -19.64% (**stable, borderline decreasing**).

4.11 A full review of the Article 12 data (2013–2018) as presented in this report will only be possible following publication of the Article 12 data for reporting period 2019–2024, which is expected to be published in mid-2026. In the absence of the Article 12 data for period 2019–2024, this report includes the latest available data for both Common Quail and European Turtle-dove, the latter with the necessary caveats as explained in the specific subsections on the Farmland Bird Indices.

[3] NB: The 2000–2024 time series (latest Farmland Bird Index for Italy) does not equate to the long-term trend since the correct time series for Italy's long-term trend is 1993–2024.

5. Consideration of autumn 2024 bag statistics, migration data and enforcement parameters

5.1 In 2024, there were 10,029 persons licensed to hunt birds on land. During the autumn hunting season, a total of 317 Common Quail (between 1 September 2024 – 31 January 2025) and 500 Turtle-doves (quota was reached on the 12 September) were reported hunted.



	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Turtle-dove	3,409	5,909	4,314	4,930	4,085	4,597	5,735	3,557	11,571	4,302	3,696	7,857	2,483	3,695	123	101	152	261	172	500	133	500	500
Quail	4,059	6,319	4,432	5,064	4,942	8,203	13,340	5,243	14,116	6,281	4,262	5,093	1,689	2,010	247	101	144	103	188	740	154	317	317

Figure 1: Quail and Turtle-dove reported hunted during autumn seasons since 2002

5.2 The total number of Quail reported hunted during the 2024 autumn season was the same as that in 2023. The total number of Turtle-doves reported hunted during the 2024 autumn season was also the same as that of 2023 given that the quota was also reached in 2023.

5.3 Detailed accounts of the reported catches by each month of the season (Figure 2, Table 1) were also considered.

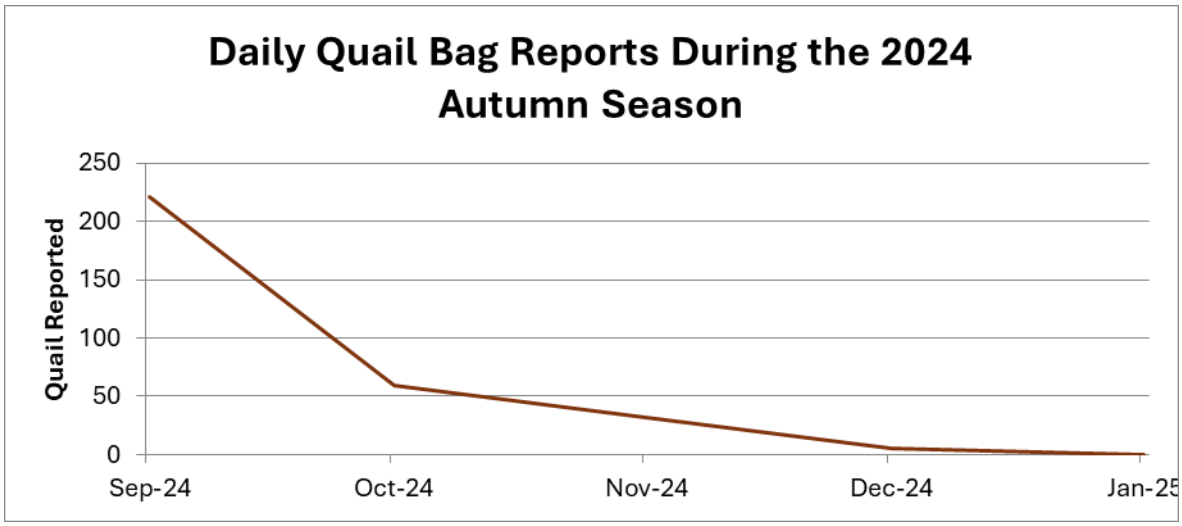


Figure 2: Reported catches for Quail between September 2024 and January 2025.

Table 1 - Monthly catches of Common Quail and Turtle-dove in the autumn of 2024 / winter 2025

Month	Quail	Turtle-dove
September '24	221	500
October '24	59	N/A
November '24	32	N/A
December '24	5	N/A
January '25	0	N/A
Total	**317**	**500**

5.4 An independent **migration study** to estimate the influx of Turtle-dove and Quail during the peak migration period in the autumn 2024 was conducted. The study aimed at surveying and scientifically monitoring the daily influx of Turtle-dove and Common Quail between 1 September and 31 October 2024 in order to estimate the overall daily presence (influx) of these two species for the whole study period, subject to scientifically justified assumptions. The full report of the study is enclosed in Annex 2 to this report.

5.5 The methodology used by Ecoserv during the autumn 2024 survey was identical to that used in surveys made by the same company from autumn 2015 to autumn 2023 (Ecoserv, 2015–2023) and during the spring migration studies (Ecoserv, 2011–2024).

5.6 The survey design was aimed at assessing changes in migratory influx, which entails trend analysis based on data from monitoring carried out regularly over a sufficiently long period comprising subsequent years and using the same methodology. During the survey, two individuals—a field assistant capable of identifying Turtle-dove and Common Quail and an observer who was responsible for recording of data in the field—were stationed at a total of 21 sites (= count stations) distributed over Malta, Comino and Gozo.

5.7 Prior to enrolment for the survey, the field assistants and observers (field personnel) were assessed by Ecoserv's environmental consultants and ecologists to ensure that they were capable of identifying the two bird species and were also briefed on the contractual procedures required for data collection. Throughout the survey, Ecoserv's environmental consultants and ecologists ensured close monitoring of the activities of the field personnel to ensure that collection of data proceeded as per designated protocol by carrying out field visits (most of which were surprise/ unannounced visits) on a regular basis.

Migration observations of Common Quail

5.8 Raw daily counts for Common Quail recorded from any given site (out of the 21 sites) during the 2023 study varied between 0 and a maximum of 6, while the mean daily counts ranged between 0 and 1.0. The recorded counts did not vary appreciably between the different sites: at the higher end, a total of 9 individuals were recorded from grid location 3881 located in north Malta; at the lower end, no Quail individuals were recorded throughout the survey period from grid locations 3292 and 4480 located in Gozo and in northeast Malta respectively.

5.9 Values of mean daily counts and total counts of Common Quail recorded during the period 1 September to 31 October 2024 from the 2024 survey, as well as the respective area surveyed at each site, are given in Table 2. Values of standard deviation associated with the mean daily counts are also provided in Table 2. Standard deviation is a measure of the variability among counts recorded from the different sites, that is, low standard deviation implies that very similar counts were recorded at all six sites surveyed during a particular day, whereas dissimilar values would lead to high standard deviation. Standard deviation is influenced by sample size (i.e. number of

study sites); it tends to increase with decreased sample size. These same values are also shown, along with values of mean counts for the same period in 2008, 2009 (Thomaidis, nd), 2014 (Ecoserv, 2014a), 2015 (Ecoserv, 2015a), 2016 (Ecoserv, 2016a), 2017 (Ecoserv, 2017a), 2018 (Ecoserv, 2018a), 2019 (Ecoserv, 2019a), 2020 (Ecoserv, 2020a), 2021 (Ecoserv, 2021a) and 2022 (Ecoserv, 2022a) and 2023 (Ecoserv, 2023a) in Figure 4. The daily mean counts recorded during the period 1 September to 31 October 2023 are overall lower than values recorded in 2008 and 2009 (Thomaidis, nd) for the same period, but similar to those recorded in 2014–2022 (Ecoserv, 2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a). No migration peaks (with a mean count >3.0) were recorded during the 2024 survey. The general pattern from all years being compared is a main migratory influx between mid-September and mid-October.

5.10 Values of the grand mean for Common Quail counts recorded during the period 1 September to 31 October 2024 from this survey, together with values of the grand mean for the same period in 2008, 2009 (Thomaidis, nd), 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023 (Ecoserv, 2014a - 2023a), are shown graphically in Figure 3. The grand mean recorded during the autumn 2024 survey is lower than that recorded during the 2008 and 2009 (Thomaidis, nd) surveys, but similar to values recorded during the 2014–2023 surveys (Ecoserv, 2014a - 2023a).

Table 2 - Values of mean (± SD) daily count and daily total count recorded from the six study sites, together with total influx of migratory Common Quail

Date	Mean Count ± SD		Total Area Surveyed (km^2)	Total count	Estimated Daily Influx
01-Sep-24	0.00	± 0.00	0.162	0	0
02-Sep-24	0.00	± 0.00	0.182	0	0
03-Sep-24	0.00	± 0.00	0.148	0	0
04-Sep-24	0.33	± 0.82	0.242	2	1828
05-Sep-24	0.00	± 0.00	0.162	0	0
06-Sep-24	0.00	± 0.00	0.182	0	0
07-Sep-24	0.00	± 0.00	0.148	0	0
08-Sep-24	0.33	± 0.52	0.242	2	1828
09-Sep-24	0.17	± 0.41	0.162	1	1364
10-Sep-24	0.00	± 0.00	0.182	0	0
11-Sep-24	0.00	± 0.00	0.148	0	0
12-Sep-24	0.00	± 0.00	0.242	0	0
13-Sep-24	0.00	± 0.00	0.162	0	0
14-Sep-24	0.00	± 0.00	0.182	0	0
15-Sep-24	0.00	± 0.00	0.148	0	0
16-Sep-24	0.33	± 0.82	0.242	2	1828
17-Sep-24	0.00	± 0.00	0.162	0	0
18-Sep-24	0.17	± 0.41	0.182	1	1217
19-Sep-24	0.17	± 0.41	0.148	1	1493
20-Sep-24	0.50	± 0.84	0.242	3	2742
21-Sep-24	0.83	± 1.33	0.162	5	6821
22-Sep-24	0.67	± 0.82	0.182	4	4868
23-Sep-24	0.17	± 0.41	0.148	1	1493
24-Sep-24	1.00	± 0.63	0.242	6	5484
25-Sep-24	0.17	± 0.41	0.162	1	1364
26-Sep-24	0.00	± 0.00	0.182	0	0
27-Sep-24	0.17	± 0.41	0.148	1	1493
28-Sep-24	0.17	± 0.41	0.242	1	914
29-Sep-24	0.33	± 0.52	0.162	2	2729
30-Sep-24	0.00	± 0.00	0.182	0	0
01-Oct-24	0.17	± 0.41	0.148	1	1493

Date	Mean Count ± SD		Total Area Surveyed (km^2)	Total count	Estimated Daily Influx
02-Oct-24	0.00	± 0.00	0.242	0	0
03-Oct-24	0.33	± 0.82	0.162	2	2729
04-Oct-24	0.17	± 0.41	0.182	1	1217
05-Oct-24	0.17	± 0.41	0.148	1	1493
06-Oct-24	0.17	± 0.41	0.242	1	914
07-Oct-24	0.50	± 0.84	0.162	3	4093
08-Oct-24	0.00	± 0.00	0.182	0	0
09-Oct-24	0.00	± 0.00	0.148	0	0
10-Oct-24	0.67	± 0.82	0.242	4	3656
11-Oct-24	0.17	± 0.41	0.162	1	1364
12-Oct-24	0.67	± 0.52	0.182	4	4868
13-Oct-24	0.67	± 0.82	0.148	4	5973
14-Oct-24	0.00	± 0.00	0.242	0	0
15-Oct-24	0.17	± 0.41	0.162	1	1364
16-Oct-24	0.17	± 0.41	0.182	1	1217
17-Oct-24	0.33	± 0.52	0.148	2	2987
18-Oct-24	0.17	± 0.41	0.242	1	914
19-Oct-24	0.00	± 0.00	0.162	0	0
20-Oct-24	0.00	± 0.00	0.182	0	0
21-Oct-24	0.00	± 0.00	0.148	0	0
22-Oct-24	0.00	± 0.00	0.242	0	0
23-Oct-24	0.17	± 0.41	0.162	1	1364
24-Oct-24	0.00	± 0.00	0.182	0	0
25-Oct-24	0.17	± 0.41	0.148	1	1493
26-Oct-24	0.00	± 0.00	0.242	0	0
27-Oct-24	0.00	± 0.00	0.162	0	0
28-Oct-24	0.00	± 0.00	0.182	0	0
29-Oct-24	0.00	± 0.00	0.148	0	0
30-Oct-24	0.00	± 0.00	0.242	0	0
31-Oct-24	0.00	± 0.00	0.162	0	0
			Sum total	**62**	**74605**

5.11 The highest mean count was recorded from Ċirkewwa (Grid 3881) located in north Malta, while overall high counts were also recorded from Xgħajra (Grid 5872) and several sites in western Malta. The lowest mean counts were recorded from Marsalforn (Grid 3292) in Gozo and Mġiebaħ (Grid 4480) in northwest Malta. The mean count recorded from the study site on Comino was 0.115, which was lower than the median value for the whole range of recorded mean counts.

5.12 As has been done in previous surveys undertaken in autumn (Ecoserv, 2014–2023) and spring (Ecoserv, 2011–2024), the total influx of Common Quail was estimated for the whole area of the Maltese Islands using the recorded area surveyed for Common Quail at each site. However, such an estimate should be considered with great caution because of the assumption that the rate of Common Quail settling at coastal sites (where the survey was carried out) is equal to that at inland locations. While this appears to hold true during spring, observations indicate that Common Quail tend to settle in larger numbers in coastal areas compared to inland ones.

5.13 It was furthermore noted that Quail also tends to appear in certain localities before others (Fenech, 2010; Fenech, *in. litt.*). On the other hand, coastal areas are more likely to serve as short-term stopover sites immediately following a migratory flight compared to inland locations; thus, including inland locations as study sites in the survey may result in an overestimate of the total influx due to repeat counting of resident Quail.

5.14 To ensure that the total area used to estimate the migration count does not include regions within which Quail do not normally settle, even though some birds may fly over urbanized areas, the total area was calculated as the sum of agricultural areas (161.5 km^2), forested areas (2.1 km^2) and areas of natural vegetation (57.8 km^2); this amounts to 221.4 km^2, representing 72% of the 315 km^2 total area of the Maltese Islands (land cover data source: MEPA, 2010).

5.15 The mean (± SD) daily counts and estimated daily influx of birds per day are shown above in Table 2. The estimated daily influx was obtained by extrapolating the mean daily values obtained for the surveyed areas to an area of 221.4 km^2 obtained as explained above. Values of estimated daily influx were then summed to obtain an estimate of the total influx of migrating Quail for the eight-week study period. Based on these data, extrapolation translates to a total influx of Common Quail during 1 September – 31 October 2024 of 74,605 individuals, or some 1,223 Quail per day (Table 2).

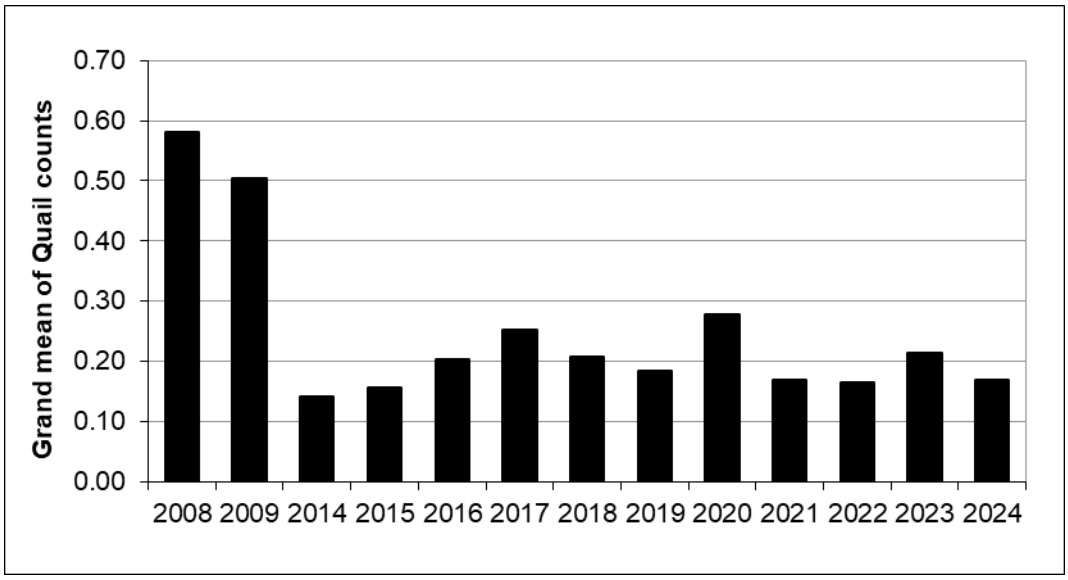


Figure 3: Grand mean of Common Quail counts made using data from the period 1 September to 31 October for autumn 2024, autumn 2014–2023 (Ecoserv, 2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a; 2023a) and autumn 2008–2009 (Thomaidis, nd).

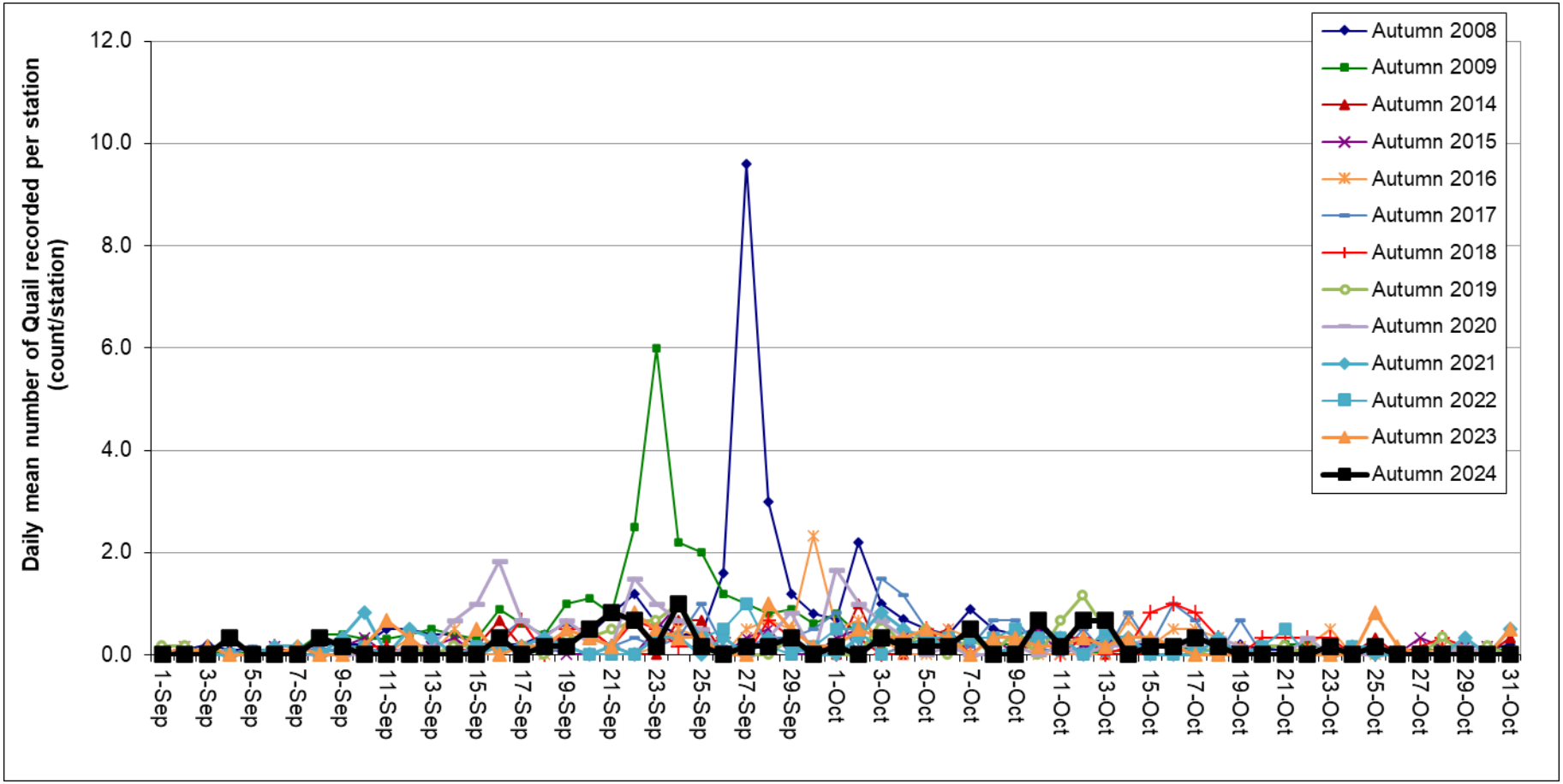


Figure 4: Daily mean counts of Common Quail per station (= site) recorded during the 2024 survey from 1 September to 31 October 2024, together with values of the same statistic for autumn 2008 and 2009 as reported in Thomaidis (nd), for autumn 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023 as reported in Ecoserv (2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a; 2023a).

Migration observations of Turtle-dove

5.16 Raw daily counts for Turtle-dove recorded from any given site (out of the 21 sites) during the 2024 study varied between 0 and a maximum of 6, while the mean daily counts ranged between 0 and 6.00 (Table 3). A peak in migratory counts was recorded on 9 September 2024, when birds were observed migrating in small groups at more than one site. The recorded counts showed some variation between the different sites over the whole survey period: at the lower end, only one Turtle Dove individuals was recorded throughout the survey period from grid location 5064 (west Malta), while at the higher end, 44 Turtle Dove individuals were recorded from the site at grid location 4085 (Comino), which was surveyed daily, followed by 18 Turtle Dove individuals recorded from the site at grid location 4070 (northwest Malta).

5.17 Values of mean daily counts and total counts of Turtle-dove recorded during the period 1 September to 31 October 2024 from the 2024 survey are summarised in Table 3. Values of standard deviation associated with the mean daily counts are also provided in Table 3. As explained above for Common Quail, standard deviation is a measure of variability among counts recorded from the different sites, that is, a low standard deviation implies that very similar counts were recorded at all six sites surveyed during a particular day, whereas dissimilar values would lead to high standard deviation. Standard deviation is influenced by sample size (i.e. number of study sites); it tends to increase with a decreased sample size. These same values are also shown, along with values of mean counts recorded for the same period in 2008, 2009 (Thomaidis, nd), 2014 till 2023 (Ecoserv, 2014 - 2023) in Figure 6. Overall, counts recorded during the 2024t survey show a similar trend to those recorded by Thomaidis (nd) in autumn 2008 and 2009, and by Ecoserv (2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a; 2023a) in autumn 2014–2023; that is, the main migratory influx occurs during September, with occasional migratory peaks recorded in some years.

5.18 Values of the grand mean of Turtle-dove counts recorded during the period 1 September to 31 October 2024 from the 2024 survey, together with values of the grand mean for the same period in 2008, 2009 (Thomaidis, nd), 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023 (Ecoserv, 2014a; till 2023a) are shown in Figure 5. Overall, the grand mean recorded during autumn 2024 falls within the range of those recorded during previous surveys held in autumn.

Table 3 - Values of mean (± SD) daily count and daily total count recorded from the six study sites, together with total influx of migratory Turtle-dove.

Date	Mean Count ± SD		Total count	Estimated Daily Influx
01-Sep-24	2.17	± 1.60	13	1175
02-Sep-24	1.00	± 0.89	6	542
03-Sep-24	1.00	± 1.10	6	542
04-Sep-24	0.67	± 0.82	4	362
05-Sep-24	0.83	± 1.17	5	452
06-Sep-24	0.67	± 1.63	4	362
07-Sep-24	0.50	± 0.84	3	271
08-Sep-24	1.33	± 2.07	8	723
09-Sep-24	6.00	± 4.43	36	3255
10-Sep-24	0.67	± 0.82	4	362
11-Sep-24	2.50	± 3.73	15	1356
12-Sep-24	1.33	± 2.16	8	723
13-Sep-24	1.33	± 0.52	8	723
14-Sep-24	0.83	± 1.17	5	452
15-Sep-24	1.33	± 1.21	8	723

Date	Mean Count ± SD		Total count	Estimated Daily Influx
16-Sep-24	0.83	± 1.60	5	452
17-Sep-24	1.83	± 1.47	11	994
18-Sep-24	0.50	± 0.84	3	271
19-Sep-24	1.33	± 1.75	8	723
20-Sep-24	0.50	± 0.84	3	271
21-Sep-24	0.67	± 0.82	4	362
22-Sep-24	0.83	± 1.17	5	452
23-Sep-24	1.67	± 2.88	10	904
24-Sep-24	0.50	± 0.55	3	271
25-Sep-24	0.17	± 0.41	1	90
26-Sep-24	0.17	± 0.41	1	90
27-Sep-24	0.17	± 0.41	1	90
28-Sep-24	0.00	± 0.00	0	0
29-Sep-24	0.00	± 0.00	0	0
30-Sep-24	0.33	± 0.52	2	181
01-Oct-24	0.00	± 0.00	0	0
02-Oct-24	0.17	± 0.41	1	90
03-Oct-24	0.17	± 0.41	1	90
04-Oct-24	0.17	± 0.41	1	90
05-Oct-24	0.67	± 1.21	4	362
06-Oct-24	0.00	± 0.00	0	0
07-Oct-24	0.50	± 0.84	3	271
08-Oct-24	0.67	± 1.03	4	362
09-Oct-24	0.33	± 0.82	2	181
10-Oct-24	1.17	± 2.86	7	633
11-Oct-24	0.33	± 0.82	2	181
12-Oct-24	0.00	± 0.00	0	0
13-Oct-24	0.00	± 0.00	0	0
14-Oct-24	0.33	± 0.52	2	181
15-Oct-24	0.00	± 0.00	0	0
16-Oct-24	0.00	± 0.00	0	0
17-Oct-24	0.00	± 0.00	0	0
18-Oct-24	0.50	± 1.22	3	271
19-Oct-24	0.00	± 0.00	0	0
20-Oct-24	0.00	± 0.00	0	0
21-Oct-24	0.33	± 0.82	2	181
22-Oct-24	0.00	± 0.00	0	0
23-Oct-24	0.00	± 0.00	0	0
24-Oct-24	0.00	± 0.00	0	0
25-Oct-24	0.00	± 0.00	0	0
26-Oct-24	0.00	± 0.00	0	0
27-Oct-24	0.50	± 1.22	3	271
28-Oct-24	0.00	± 0.00	0	0
29-Oct-24	0.17	± 0.41	1	90
30-Oct-24	0.00	± 0.00	0	0
31-Oct-24	0.00	± 0.00	0	0
		Sum total	**226**	**20428**

5.19 The highest mean count was recorded from Fawwara (Grid 4666) located in west Malta, while overall high counts were recorded from other study sites located along the western parts of Malta and from San Blas and Kerċem in Gozo. The lowest mean was recorded from Lapsi (Grid 5064) in west Malta, while relatively low counts were also recorded from some sites located on the southeastern parts of Malta and from Marsalforn in Gozo. The mean count

recorded from the study site on Comino was 0.721, which was higher than the median value for the whole range of recorded mean counts.

5.20 As has been done in previous surveys undertaken in autumn (Ecoserv, 2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a, 2021a; 2022a; 2023a) and spring (Ecoserv, 2011; 2012; 2013; 2014b; 2015b; 2016b; 2017b; 2018b; 2019b; 2020b; 2021, 2022, 2023, 2024), an estimate of the total influx of Turtle-dove over the Maltese Islands was made using the daily counts. Extrapolations were then made to obtain the total number of individuals of this species that have migrated over the Maltese Islands on a particular date. However, as emphasised in reports from previous surveys (Ecoserv, 2014a till 2022a), such an estimate must be treated with utmost caution, given that the Turtle-dove migration starts around the third week of August, which period is not covered by the present survey; the relatively small number of sites used; and that the counts were not made daily at each site.

5.21 Furthermore, passage of birds at different localities is extremely variable, with potential large differences in number of birds passing at two different localities, even if these are separated only by a very small distance. As already stated, the other limiting factor is that the field survey stops at 14:00 and does not start again before 07:00, hence potentially missing birds that arrive in the afternoon and during the night, which are usually seen at the very first light of day, some of which may have been hunted in the early hours of the morning, and therefore these may have not been recorded by the field observers during the survey. On the other hand, the estimate given in the present report is useful when making comparisons between different years, assuming data from surveys based on a similar design are available to assess whether the trend in influx is increasing or decreasing with time. Since the coastal length surveyed at each site during the survey is approximately 0.5 km, the mean daily count represents the mean influx of Turtle-dove per 0.5 km coastline.

5.22 The estimated daily influx was obtained by extrapolating the recorded mean daily values (per 0.5 km) to the total coastline length for the Maltese Islands, which have a perimeter of 271.22 km (Mallia et al, 2002); that is, the estimated daily influx equals the mean daily count multiplied by an extrapolation factor of 271.22/0.5. The values of estimated daily influx were then summed to obtain an estimate of the total influx of migrating Turtle-dove for the eight-week study period. Based on the mean daily counts, extrapolation translates to an estimated daily influx ranging between 0 and 3,255 individuals, with a total influx over the survey period (1 September to 31 October; i.e. 61 days) of 20,428 individuals, i.e. some 335 birds per day.

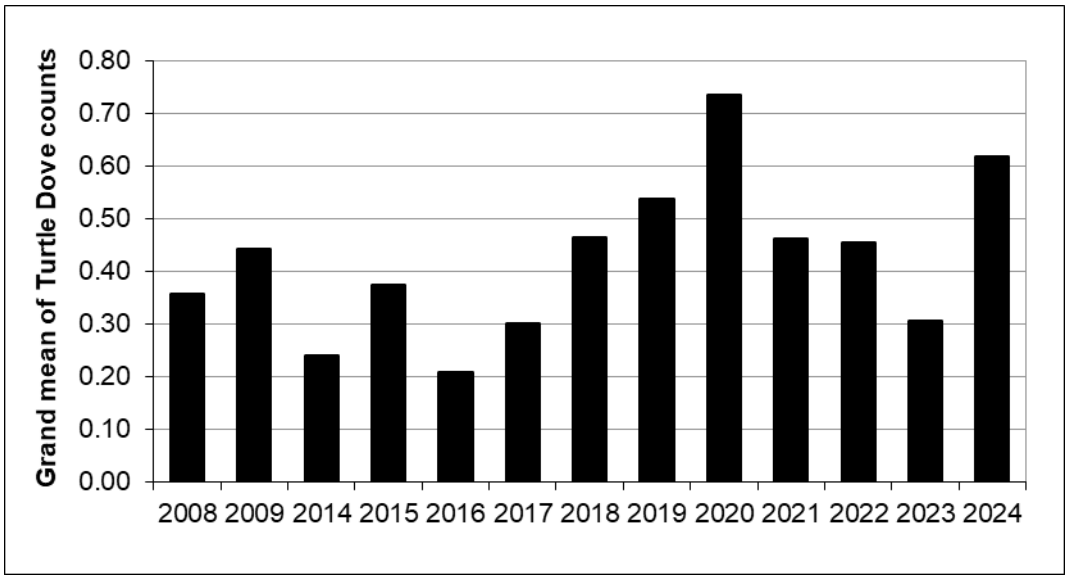


Figure 5: Grand mean of Turtle Dove counts made using data from the period 1 September to 31 October for autumn 2024, autumn 2014–2023 (Ecoserv, 2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a; 2023a) and autumn 2008–2009 (Thomaidis, nd).

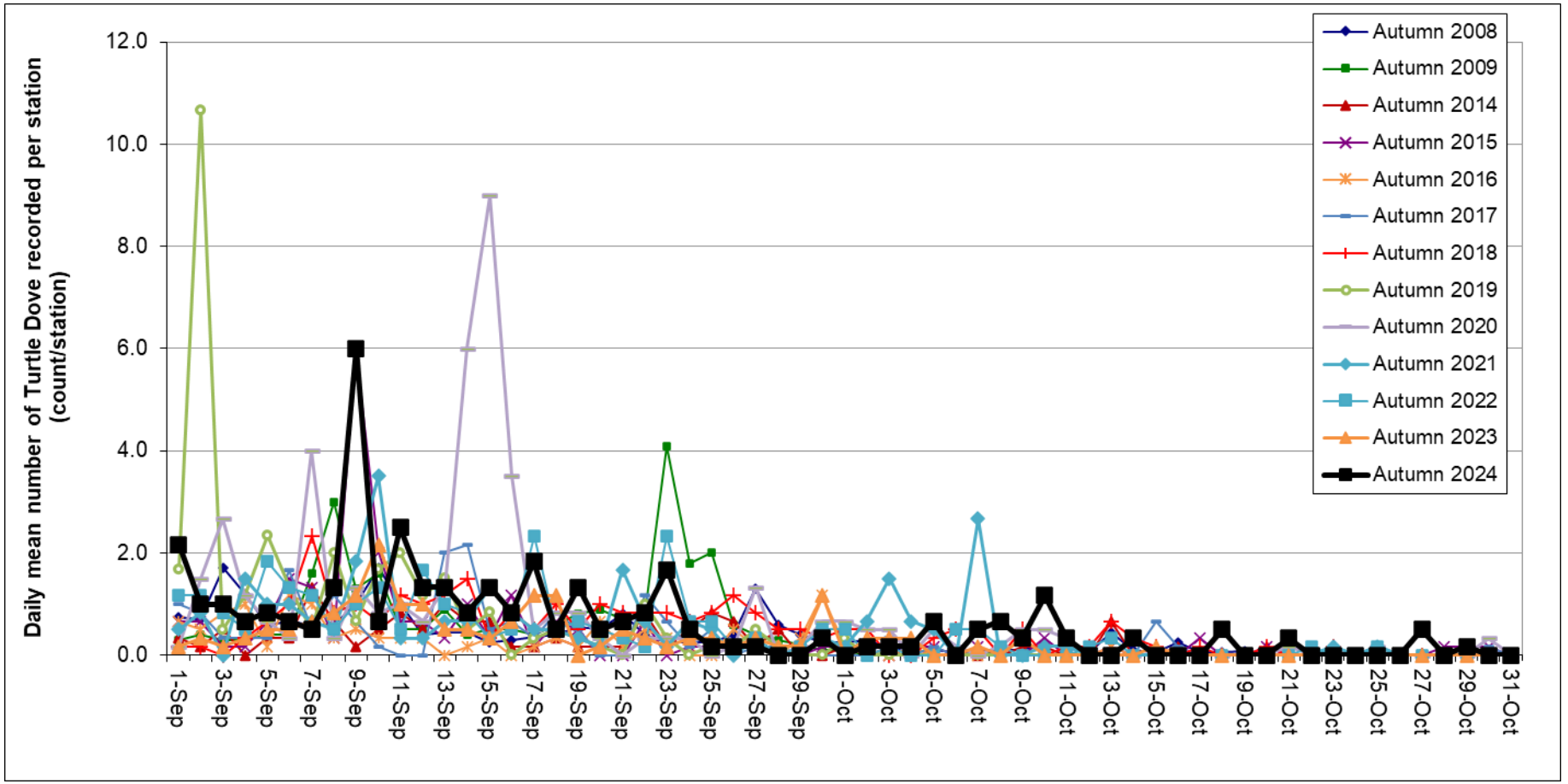


Figure 6: Daily mean counts of Turtle Dove per station (= site) recorded during the present survey from 1 September to 31 October 2024, together with values of the same statistic for autumn 2008 and 2009 as reported in Thomaidis (nd), and for autumn 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022 and 2023 as reported in Ecoserv (2014a; 2015a; 2016a; 2017a; 2018a; 2019a; 2020a; 2021a; 2022a; 2023a).

Correlation of migration observations with reported bags

5.23 The analysis shows that there was a similar temporal trend of zero or low counts in early September followed by higher counts until around early October, and a subsequent decline in counts in late October, in both the daily counts made during the survey and the bag count data for the Common Quail. With regards to the Turtle-dove a similar temporal trend of counts in the first half of September 2024 in both the daily counts made during the survey and the bag count data was observed, while no comparison could be made for the period 13 September to 31 October since the hunting season for Turtle-dove was closed on 12 September 2024. (Figure 7 and Figure 8).

5.24 The above data on reported catches and observation trends were considered also in the context of the enforcement statistics pertaining to the 2024 autumn season summarised below.

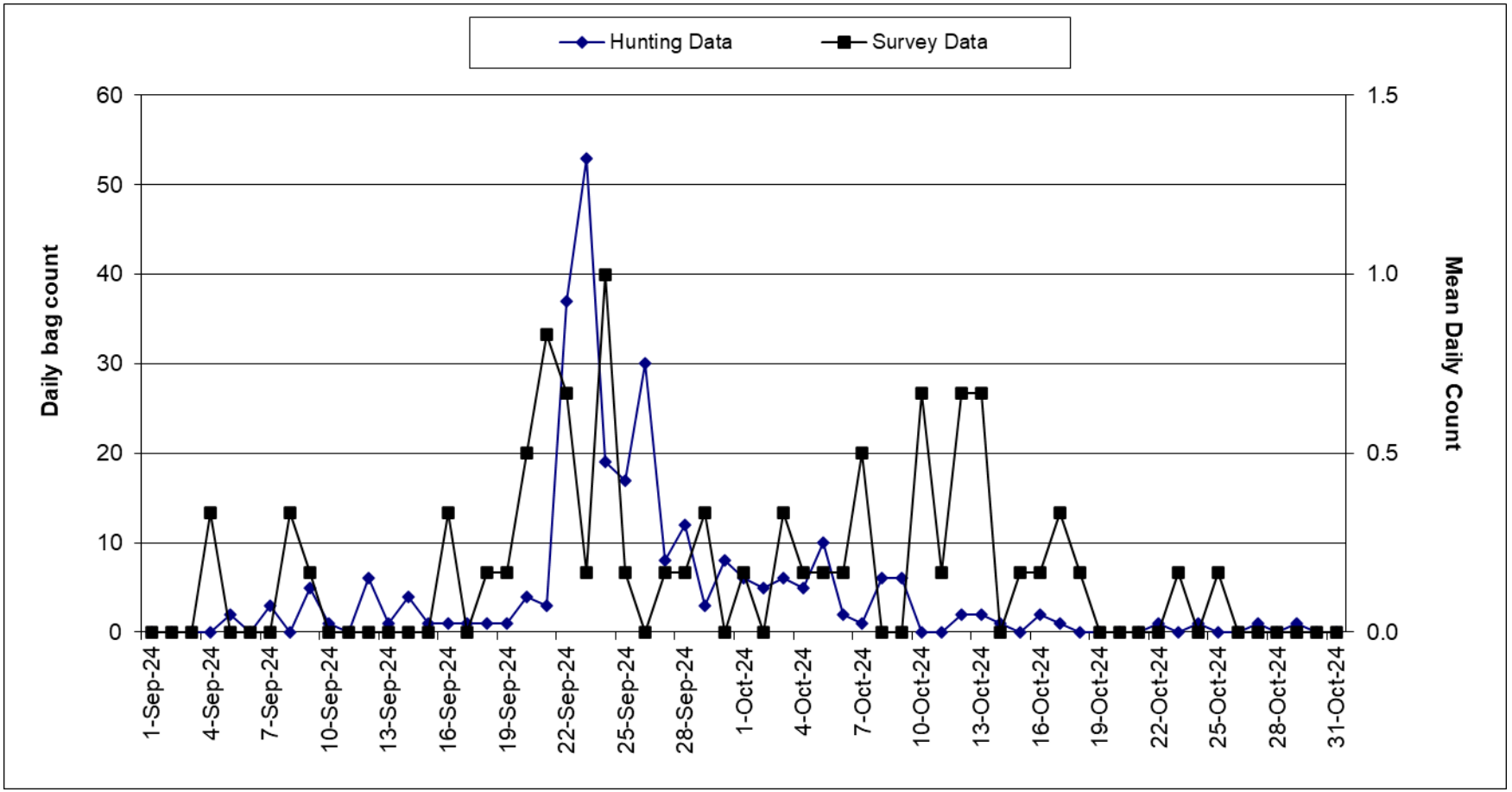


Figure 7: Daily bag count of Common Quail during 2024 (blue line; values on left-side y-axis), together with the mean daily counts recorded during the 2024 survey (black line; values on right-side y-axis), for the period 1 September – 31 October 2024.

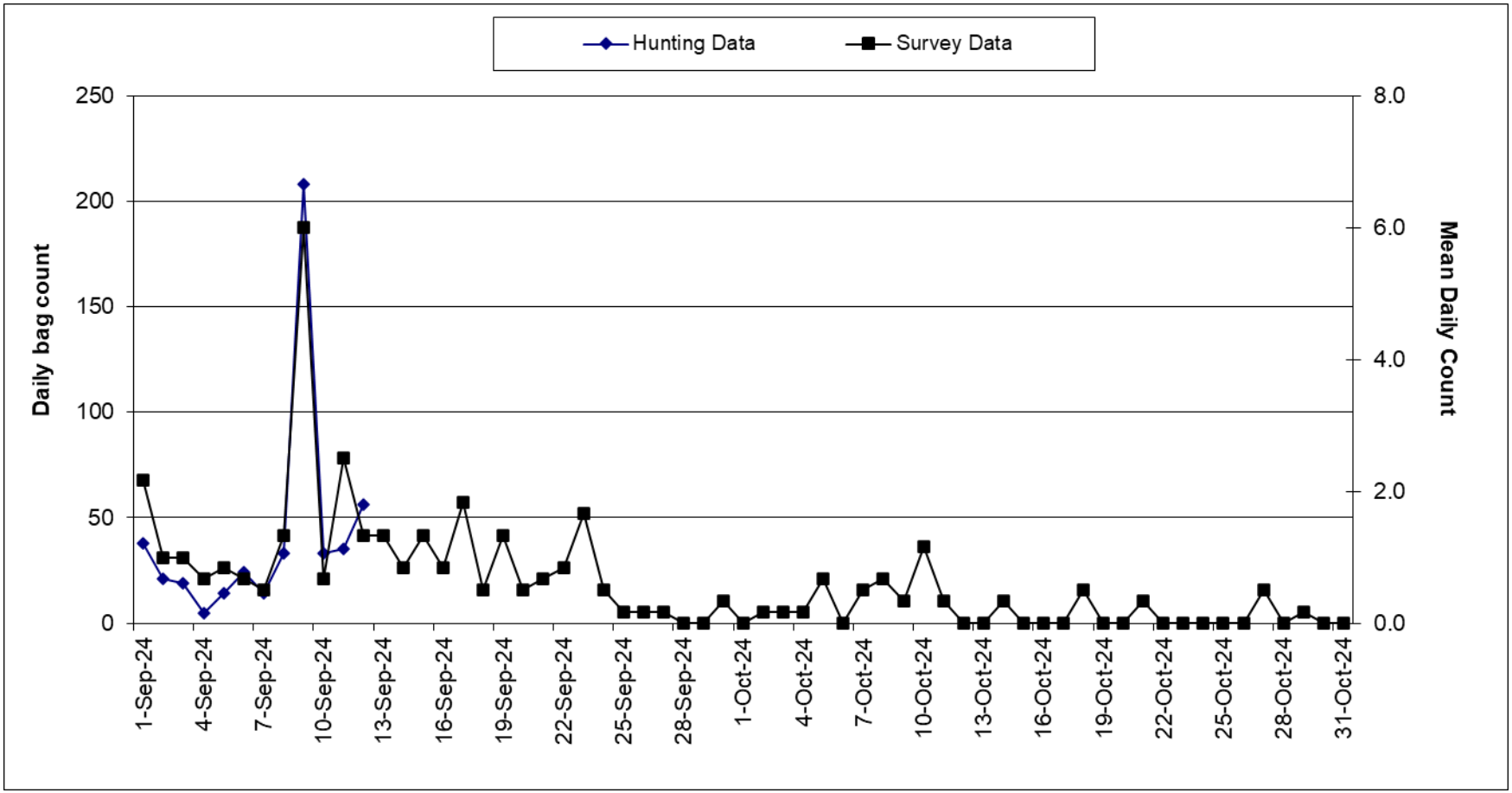


Figure 8: Daily bag count of Turtle Dove during 2024 (blue line; values on left-side y-axis), together with the mean daily counts recorded during the 2024 survey (black line; values on right-side y-axis), for the period 1 September – 31 October 2024. It should be noted that bag counts after 12 September are all zero given that the hunting season for this species closed on this date.

6. Determination of the 2025 spring hunting bag limit and other parameters

6.1 Regulation 5 of the Framework Regulations stipulates the requirement for the establishment of an overall bag limit for a spring hunting season for Quail and for Turtle-dove, based on figures contained in Annex 1 to the same Regulations. The same Regulations also stipulate the requirement of taking into consideration the conservation status of the two species concerned and the maintenance of the population of both species at a satisfactory level when establishing the overall bag limit. Regulation 5 also provides for the requirement of establishing seasonal and daily bag limits per hunting licence.

6.2 The Regulations also establish that, should a spring hunting season be declared open, the overall national spring hunting limits would be set at not more than a ceiling limit of 5,000 for Quail and 11,000 for Turtle-dove, based on the principle of 1% of the total annual mortality of the species. They also establish that a spring hunting season will not be opened in cases where the number of birds hunted during the previous autumn season reaches 20,000 in the case of Quail and 21,000 in the case Turtle-dove. Furthermore, it should be noted that:

(i) the maximum bag limit for a spring hunting derogation may be fully allowed in cases where the number of Quail or Turtle-dove hunted during the previous autumn season does not exceed 10,000 individuals for each species respectively; and that,
(ii) the maximum bag limit for a spring hunting derogation should be reduced by inverse proportion to the number of birds hunted in excess of 10,000 or each species in the previous autumn season.

6.3 Since the total bag for the autumn 2024 hunting season was 317 Quail and 500 Turtle-dove, the maximum limit of birds hunted in autumn as established by the Regulations in question (20,000 for Quail / 21,000 for Turtle-dove) was not reached. Moreover, since the numbers hunted did not exceed 10,000 individuals in either species, the maximum national bag limit allowed by law could have been applied.

6.4 However, the European Turtle-dove (*Streptopelia turtur*) was uplisted as Vulnerable on the IUCN global Red List of Threatened Species and, on the basis of Member States' reports under Article 12 of the Birds Directive, it was classified as Near Threatened within the territory of the European Union. Given the rapid decline an "International Single Species Action Plan for the Conservation of the European Turtle-dove 2018-2028" (ISSAP) was prepared in the context of the LIFE EuroSAP project. It was recommended for implementation by NADEG members in May 2018 and then adopted at COP 12 (October 2018) of the Convention on Migratory Species. After discussing the issue through workshops and ad-hoc meetings, the European Commission requested Member States forming part of the Central-Eastern Flyway and that hunt this species, to implement a compliance system if a hunting season of the Turtle-dove was foreseen. Malta has committed to implement the measures recommended by the European Commission and in 2021 limited the annual bag to a maximum 50% of the average off-take between 2013–2018. The 50% reduction in hunting bag of the average off-take between 2013–2018 for Malta adds up to 2,000 Turtle-doves. Legal Notice 341 of 2021[4] reduced the autumn national quota of the Turtle-dove from 7,000 to 500 birds, huntable in September only (from 1 to 30 September, inclusive of both dates). In 2025, available scientific data on population size and trends segregated for each Member State that constitutes the reference population for Malta, is Article 12 report for period 2013-2018. As outlined in Section 4 of this report, through this data, the Turtle-dove's reference population is stable both in its short-term trend and in the long-term trend, thus Malta proposed a national quota of 1,500 Turtle-doves for the 2025 spring hunting season.

[4] Legal Notice 341 of 2021 https://legislation.mt/eli/ln/2021/341/eng

6.5 Based on the above, the 2025 spring hunting overall bag limit for Quail was set at 2,400 and 1,500 for Turtle-dove on condition that the season would be closed immediately should this national overall bag limit be reached before 4 May 2025.

7. Application process and issuance of special spring hunting licences

7.1 In order to be eligible for a 2025 Spring Hunting Special Licence, a hunter was required to be in possession, by the time of application, of the following:

(a) Valid general licence to hunt birds on land;
(b) Paid-up membership in a recognised hunting organisation for 2025;
(c) Valid third-party liability insurance cover for 2025;
(d) Valid permit to carry a firearm for hunting of birds on land issued by the Police.

7.2 Applications for a special spring hunting licence were received through the telephonic Game Reporting System (GRS) during a seven-day period from 27 March to 2 April 2025. During this period, the GRS was switched over to an application call flow where callers in possession of a valid general hunting licence were guided via automated voice prompts and declarations to apply for a special licence.

7.3 In 2025, the Wild Birds Regulation Unit received 8,001 applications for a spring hunting special licence, which is approximately 0.2% higher than the number of applications received in 2024 (7,982).

7.4 A total of 8,001 licences were subsequently issued. A total of 88 issued licences remained unclaimed throughout the season, leaving a total of 7,913 active licences. Details on minimum statutory enforcement deployment is provided in the enforcement section of this report.

7.5 Spring hunting licence conditions were established according to the provisions of the Framework Regulations and the provisions of Legal Notice 73 of 2025 as well as the provisions of Legal Notice 74 of 2025. Additionally, all licensed hunters were required to abide by the regulations laid down in the Conservation of Wild Birds Regulations. A copy of the special spring hunting licence, including details of the licence conditions, is attached in Annex 3 to this report.

7.6 Hunters were required to carry their spring hunting licence and general licence at all times. They were also required to immediately report Quail and/or Turtle-dove caught by calling on 8000 2020, or by using the Game Reporting MT mobile application. Hunters were also required to abide by the time restrictions and respect the national bag limits of 2,400 Quail and 1,500 Turtle-dove. These conditions were strictly monitored, supervised and enforced, as described in the enforcement section of this report.

8. Activity Data (Hunting Effort)

8.1 As in previous years, hunters were obliged to report ‘hunting effort’ after each hunting outing which did not result in any bagged game through the Telephone Game Reporting System or the Game Reporting mobile app.

8.2 Reporting ‘hunting effort’ is a legal obligation as provided for by Regulation 12(9) and paragraph 1(c) of Schedule IV of the Conservation of Wild Birds Regulations as well as being explicitly stated in condition 10 of the special licence. Subsequently, hunters who upon inspection are found to have failed to report their hunting effort are issued with an administrative fine of €50, in line with Schedule VIII of the same Regulations.

8.3 During the 2025 spring hunting season, 740 individuals reported at least one bird caught whereas 1,685 individuals reported hunting effort only (no birds caught)—the data excludes individuals

who were issued with a fine for failure to fulfil their reporting obligations (vide section 12 on enforcement). The maximum number of hunters active on any given day during the 2025 spring hunting season was 799 on 4th May, as shown in Figure 9.

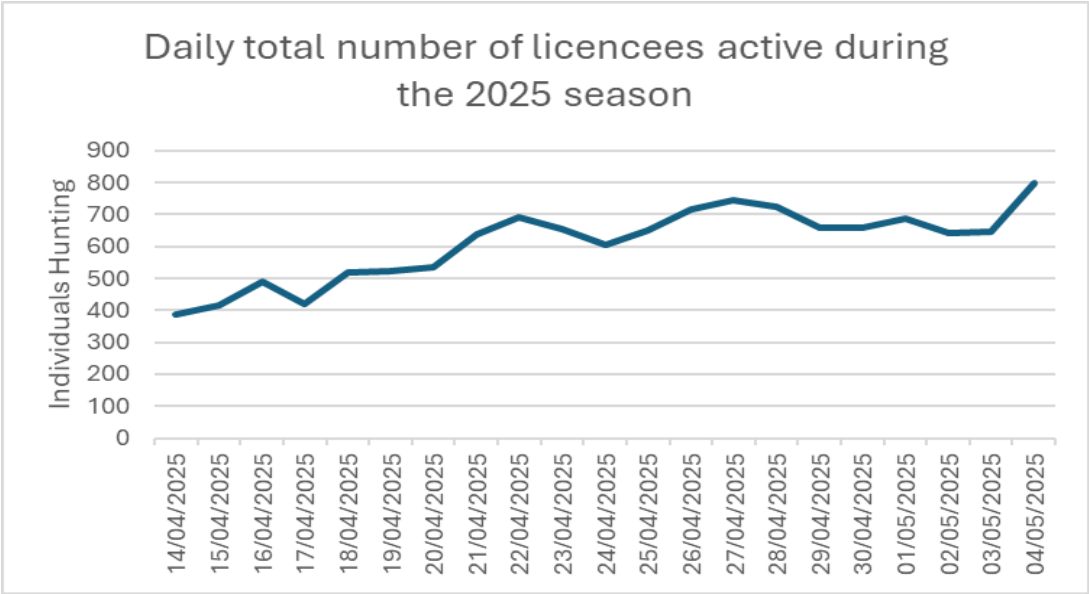


Figure 9: Individuals hunting during the open season.

9. Real-time Game Reporting System

9.1 All hunters in possession of a spring hunting licence were reminded of their legal obligations through a letter sent together with the Spring Hunting Licence.

9.2 In accordance with Regulation 5(d) of the Framework Regulations, hunters in possession of the special spring hunting licence were obliged to immediately notify the authorities of any Quail and/or Turtle-dove hunted during the season. The Special Licence required the hunters to do so by calling on the telephone reporting system via their mobile phones or through a mobile reporting app immediately after catching a Quail or Turtle-dove stating the amount of birds caught.

9.3 Each report was registered in a database. Only calls made from registered mobile numbers of hunters in possession of a Special Licence were accepted for reporting. The relevant data for reported Quail and Turtle-dove is presented in Table 4 and Figure 10 respectively.

Table 4 - Number of birds reported through the game reporting system

Date	Quail	Turtle Dove
14/04/2025	29	
15/04/2025	21	
16/04/2025	29	
17/04/2025	26	
18/04/2025	44	
19/04/2025	59	
20/04/2025	48	
21/04/2025	17	22
22/04/2025	18	28

23/04/2025	16	35
24/04/2025	15	29
25/04/2025	27	76
26/04/2025	22	77
27/04/2025	16	45
28/04/2025	19	56
29/04/2025	23	21
30/04/2025	23	60
01/05/2025	30	99
02/05/2025	21	119
03/05/2025	21	138
04/05/2025	40	231
Total	**564**	**1036**

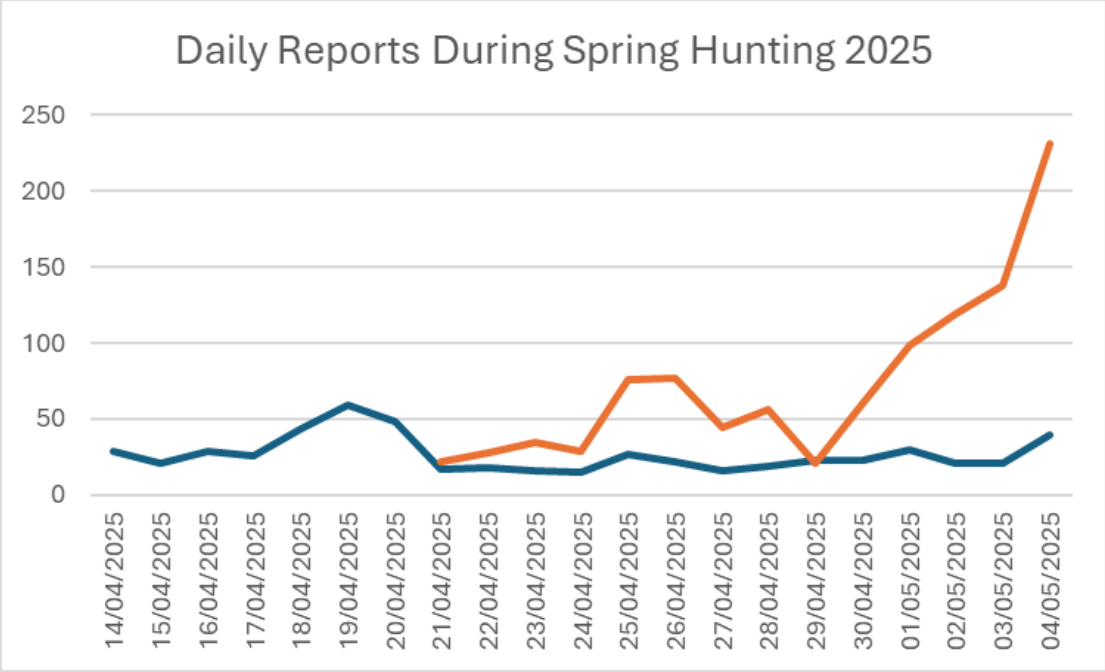


Figure 10: Daily total number of Quail and Turtle-dove reported during the 2025 spring hunting season – as reported through the telephonic system.

9.4 The total number of reported birds did not exceed any of the national overall bag limits. During the 2025 spring hunting, the total number of Quail reported equates to 23.5% of the limit permitted by law, while the total number of Turtle-dove reported equates to 69.1% of the limit. Table 5 provides data on the number of Quail and Turtle-dove caught. There were 968 hunters who reported Quail and 464 hunters who reported Turtle-dove during the 2025 spring hunting season.

Table 5 - Number of birds caught by hunters.

Birds reported shot by hunters	Number of hunters declaring Quail	Number of hunters declaring Turtle-dove
1	341	789
2	66	89
3	16	13
4	3	5
5	3	2
6	0	0
7	1	0
8	0	0
9	1	0
10	0	0
>10	0	0

9.5 Hunters were bound by a legal obligation to report game caught immediately upon making a catch, thus allowing precise temporal data to be collected. Table 6 indicates percentages of Quail and Turtle-dove reports made within each hour time band.

Table 6 - Percentages of Quail and Turtle-dove reports made within each hour time band.

Time	Quail Reports (%)	Turtle-dove Reports (%)
05:00 - 06:00	0.0	0.7
06:00 - 07:00	2.8	8.1
07:00 - 08:00	7.3	14.6
08:00 - 09:00	13.8	13.5
09:00 - 10:00	18.1	12.5
10:00 - 11:00	25.5	20.5
11:00 - 12:00	30.5	21

10. Independent bird migration study in spring 2025

10.1 As was also the case in previous years, an independent scientific study was carried out in Spring 2025, in order to obtain an estimate of migratory influxes of Turtle-dove and Common Quail over the derogation period. The study was carried out by Ecoserv (2025) with the following main objective: *To survey and scientifically monitor the daily influx of the Turtle-dove and Common Quail; to estimate the overall presence (influx) of these two species per day and for the whole study period and to analyse observed and estimated migration trends in conjunction with the trends recorded in past studies, and in conjunction with any hunting data on the species surveyed*. The geographical scope of the study extended across the three inhabited islands of the Maltese archipelago (that is, Malta, Gozo and Comino), with data gathered between 15 March and 15 May 2025. A full copy of the report in question is attached in Annex 4, with key conclusions summarised below.

10.2 The methodology used in this study was identical to the methodology used for similar studies conducted in 2011–2024. Twenty-eight monitoring stations were set up across the Maltese Islands, with counts obtained from ten different sites each day. A field assistant capable of identifying the relevant species and an observer responsible to record data were posted to each station, in order to conduct counts of individuals. Each group of ten sites was surveyed once every three days, such that over a three-day period, all 28 sites would have been surveyed. Furthermore, wherever possible, the study site at Comino was included in the ten sites surveyed on any one day, such that this site was surveyed on a daily basis. When weather conditions precluded surveys at the Comino site due to unavailability of sea transport services, these were undertaken at an alternative site (Qala, San Blas or Ramla tal-Bir) instead. Given that the study was mainly intended to quantify the influx of migrating individuals, field sites were located at strategic locations along the coast, which locations would be expected to serve as stop-over points for migrating individuals.

10.3 Counts obtained across this network of observation stations over the survey period for the Turtle-dove are given in Table 7 below.

Table 7 - Counts obtained for Turtle-dove across the network of observation stations over the study period.

Date	Total Daily Count
15-Mar-25	1
16-Mar-25	1
17-Mar-25	0
18-Mar-25	1
19-Mar-25	0
20-Mar-25	0
21-Mar-25	0
22-Mar-25	1
23-Mar-25	2
24-Mar-25	2
25-Mar-25	0
26-Mar-25	2
27-Mar-25	0
28-Mar-25	2
29-Mar-25	0
30-Mar-25	0
31-Mar-25	0
01-Apr-25	0
02-Apr-25	0
03-Apr-25	0
04-Apr-25	3

Date	Total Daily Count
05-Apr-25	4
06-Apr-25	3
07-Apr-25	3
08-Apr-25	4
09-Apr-25	4
10-Apr-25	4
11-Apr-25	49
12-Apr-25	18
13-Apr-25	26
14-Apr-25	46
15-Apr-25	26
16-Apr-25	9
17-Apr-25	23
18-Apr-25	39
19-Apr-25	28
20-Apr-25	33
21-Apr-25	19
22-Apr-25	16
23-Apr-25	23
24-Apr-25	15
25-Apr-25	34
26-Apr-25	21
27-Apr-25	12
28-Apr-25	22
29-Apr-25	19
30-Apr-25	10
01-May-25	27
02-May-25	17
03-May-25	17
04-May-25	11
05-May-25	12
06-May-25	8
07-May-25	4
08-May-25	8
09-May-25	4
10-May-25	12
11-May-25	10
12-May-25	4
13-May-25	2
14-May-25	4
15-May-25	0
Total	**665**

10.4 Daily raw counts for Turtle-dove recorded from the 28 sites during the 2025 study varied between 0 and a maximum of 49, while the mean daily counts ranged between 0 and 4.90. Overall, counts recorded during the 2025 survey show a similar trend to those recorded in previous surveys. The general pattern is of very low counts recorded in March and early April, with marginally higher counts recorded from mid-April to early May. The daily mean counts recorded during the 2025 survey are similar to those recorded in previous years. Occasional peaks were recorded in some years: in 2008, a very high mean count (98, on 15-4-08) and a secondary peak (26, on 20-04-08) were recorded, while a single main peak was recorded in 2009 (33, on 23-04-09) and in 2018 (25, on 19-04-18); no mean counts greater than 20 were recorded in any of the other years, including during the 2025 survey (**Error! Reference source not found.**).

10.5 The grand mean of Turtle-dove counts recorded during the period 15 March to 15 May from the 2025 survey is 1.07; this is appreciably lower than the grand mean of 2.76 recorded over the same period in 2009 but within the range of those recorded in 2019–2024 (0.98–1.40). Comparisons of the grand mean for the period 15 March to 15 May from the 2025 study with that from other previous surveys is not possible since the latter covered much shorter periods. The main period which was covered by most surveys is from 10 to 30 April. Values of the grand mean of Turtle-dove counts recorded during this period (10 to 30 April) from the 2025 survey, together with values of the grand mean for the same period in 2018, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024), for the period 14 to 30 April 2015 (Ecoserv, 2015), for the period 10 to 14 April 2017 (Ecoserv, 2017), and for the period 10 to 21 April 2018 (Ecoserv, 2018) are shown in **Error! Reference source not found.**. Overall, the grand mean recorded during the 2025 survey during the period 10 to 30 April is similar to that recorded from most surveys held between 2012 and 2024, but lower than that recorded from surveys made in 2008, 2009 and 2018.

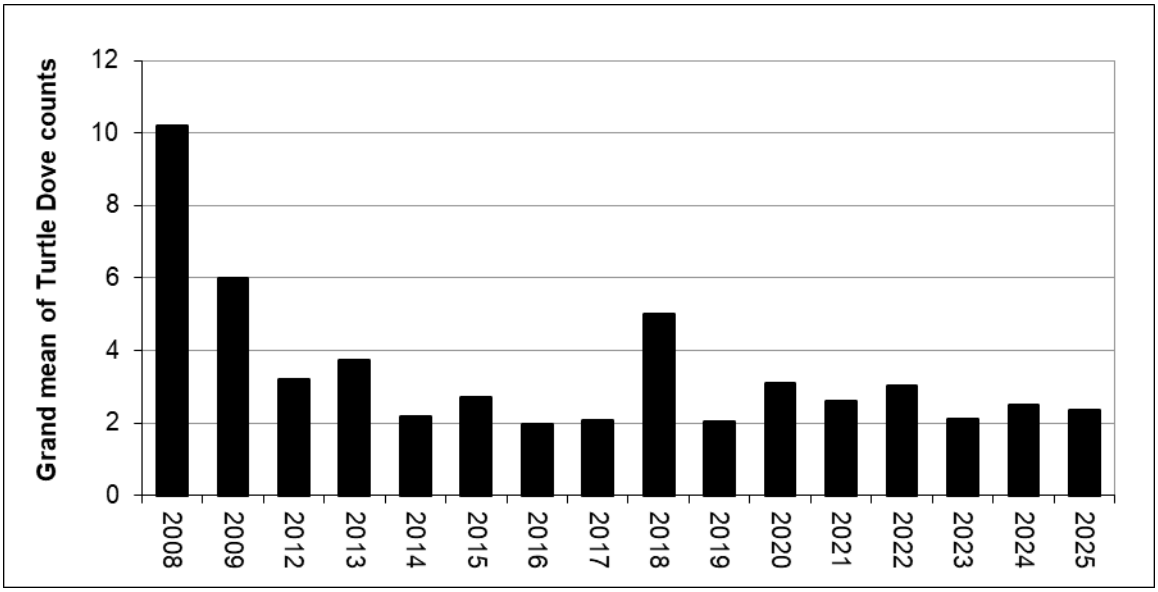
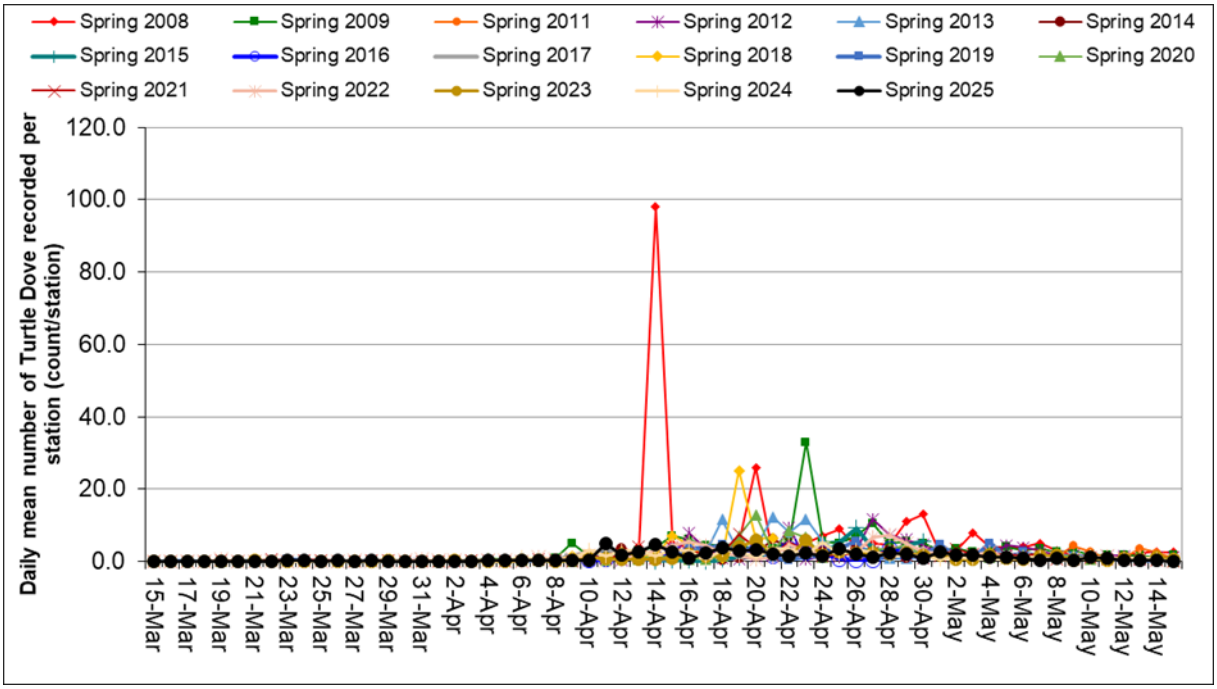


Figure 11- Grand mean of Turtle Dove counts for data from the period 10 to 30 April recorded in spring 2025 and spring 2008, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024), together with the grand mean for data from the period 14 to 30 April recorded in spring 2015 (Ecoserv, 2015), from the period 10 to 14 April recorded in spring 2017 (Ecoserv, 2017), and from the period 10 to 21 April recorded in spring 2018 (Ecoserv, 2018).



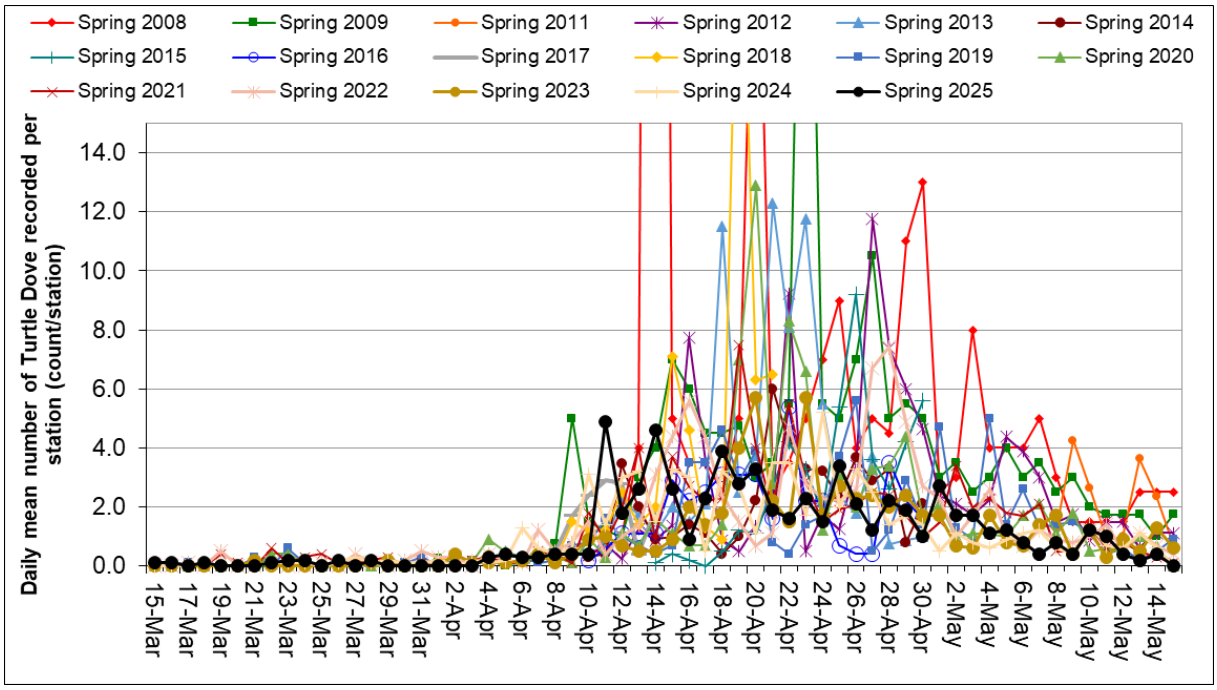


Figure 12 - Daily mean counts of Turtle Dove per station (= site) recorded during the present (spring 2025) survey held between 15 March and 15 May, together with values of the same statistic for spring 2008, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024).
Top: graph showing all values including peak counts >20 individuals recorded in 2008, 2009 and 2018;
Bottom: graph showing all values except the peak counts >20 individuals recorded in 2008, 2009 and 2018.

10.6 Extrapolations were made to obtain the approximate total number of Turtle-dove individuals of this species that are envisaged to have migrated over the Maltese Islands on a particular date. However, as emphasised in reports of surveys from previous years made in spring (Ecoserv, 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019; 2020; 2021; 2022; 2023; 2024), such an estimate must be treated with utmost caution, given the relatively small number of sites used on any one day and that the counts were not made daily at each site. Furthermore, passage of birds at

different localities is extremely variable, with potential large differences in birds passing at two different sites, even if these are separated by a small distance. As already stated in the introduction section above, the other limiting factor is that the field survey stops at 14:00 and does not start again before 07:00 of the following morning, hence potentially missing birds arriving late in the afternoon and early evening, as well as those arriving during the night, which may have not been recorded by the field observers during the survey.

10.7 On the other hand, the estimate given in the 2025 report is useful when making comparison between different years, assuming data from surveys based on a similar design are available to assess whether the trend in influx is increasing or decreasing with time. Since the coastal length surveyed at each site during the present survey is approximately 0.5 km, the total influx of migrating Turtle-dove for the three-week study period was estimated by extrapolating the values obtained to the total coastline length for the Maltese Islands, which have a perimeter of 271.22 km (Mallia et al, 2002). Based on the mean daily counts, extrapolation translates to an estimated daily influx ranging between 0 and 2,658 individuals, with a total influx over the survey period (15 March to 15 May 2025; i.e. 62 days) of 36,070 individuals, i.e. some 582 birds per day.

Table 8 - Estimated total influx of Turtle-dove during the 2025 study period.

Date	Estimated Total Daily Influx
15-Mar-25	54
16-Mar-25	54
17-Mar-25	0
18-Mar-25	54
19-Mar-25	0
20-Mar-25	0
21-Mar-25	0
22-Mar-25	54
23-Mar-25	108
24-Mar-25	108
25-Mar-25	0
26-Mar-25	108
27-Mar-25	0
28-Mar-25	108
29-Mar-25	0
30-Mar-25	0
31-Mar-25	0
01-Apr-25	0
02-Apr-25	0
03-Apr-25	0
04-Apr-25	163
05-Apr-25	217
06-Apr-25	163
07-Apr-25	163
08-Apr-25	217
09-Apr-25	217
10-Apr-25	217
11-Apr-25	2658
12-Apr-25	976
13-Apr-25	1410
14-Apr-25	2495
15-Apr-25	1410
16-Apr-25	488
17-Apr-25	1248
18-Apr-25	2116
19-Apr-25	1519
20-Apr-25	1790

Date	Estimated Total Daily Influx
21-Apr-25	1031
22-Apr-25	868
23-Apr-25	1248
24-Apr-25	814
25-Apr-25	1844
26-Apr-25	1139
27-Apr-25	651
28-Apr-25	1193
29-Apr-25	1031
30-Apr-25	542
01-May-25	1465
02-May-25	922
03-May-25	922
04-May-25	597
05-May-25	651
06-May-25	434
07-May-25	217
08-May-25	434
09-May-25	217
10-May-25	651
11-May-25	542
12-May-25	217
13-May-25	108
14-May-25	217
15-May-25	0
Total	**36,070**

10.8 Counts for Common Quail obtained across the twenty-eight monitoring stations set up across the Maltese Islands as described in section 10.2 are given in Table 9 below.

Table 9 - Counts obtained for Common Quail across the network of observation stations over the study period.

Date	Total Daily Count
15-Mar-25	4
16-Mar-25	2
17-Mar-25	1
18-Mar-25	4
19-Mar-25	3
20-Mar-25	3
21-Mar-25	4
22-Mar-25	4
23-Mar-25	4
24-Mar-25	8
25-Mar-25	1
26-Mar-25	12
27-Mar-25	4
28-Mar-25	3
29-Mar-25	3
30-Mar-25	8
31-Mar-25	3
01-Apr-25	8
02-Apr-25	10

Date	Total Daily Count
03-Apr-25	11
04-Apr-25	4
05-Apr-25	8
06-Apr-25	7
07-Apr-25	11
08-Apr-25	6
09-Apr-25	2
10-Apr-25	9
11-Apr-25	4
12-Apr-25	6
13-Apr-25	3
14-Apr-25	8
15-Apr-25	9
16-Apr-25	7
17-Apr-25	6
18-Apr-25	5
19-Apr-25	8
20-Apr-25	2
21-Apr-25	0
22-Apr-25	0
23-Apr-25	4
24-Apr-25	0
25-Apr-25	2
26-Apr-25	0
27-Apr-25	1
28-Apr-25	1
29-Apr-25	1
30-Apr-25	0
01-May-25	2
02-May-25	0
03-May-25	0
04-May-25	0
05-May-25	1
06-May-25	0
07-May-25	0
08-May-25	1
09-May-25	0
10-May-25	2
11-May-25	0
12-May-25	0
13-May-25	0
14-May-25	0
15-May-25	0
Total	**220**

10.9 Daily raw counts for Common Quail recorded from the 28 sites during the 2025 study varied between 0 and a maximum of 12, while the mean daily counts ranged between 0 and 1.20. Overall, counts recorded during the present study remained low during the entire survey period

but were slightly higher between late March to end April and lowest in May. The general pattern observed in previous surveys is of low migratory counts in mid-March, which start to increase in late March, with the highest counts usually recorded in mid to end April, and a subsequent decline in counts during May. The daily mean counts recorded during the present survey are overall slightly lower than those in 2008 and 2009 (Thomaidis, nd) and similar to those in 2011–2024 (Ecoserv 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019; 2020; 2021; 2022; 2023; 2024). Minor peaks of around 2.0–3.0 were recorded in spring 2008, 2009, 2012 and 2020, while no mean counts greater than 2.0 were recorded in any of the other years, including in the 2025 survey.

10.10 The grand mean of Common Quail counts recorded during the period 15 March to 15 May from the 2025 survey is 0.35, which is lower than the grand mean of 0.74 recorded over the same period in 2009, but within the range of those recorded in 2019–2024 (0.19–0.40). Comparisons of the grand mean for the period 15 March to 15 May with other previous surveys is not possible since these covered much shorter periods. The main period which was covered by most surveys is from 10 to 30 April. Values of the grand mean of Common Quail counts recorded during this period (10 to 30 April) from the 2025 survey, together with values of the grand mean for the same period in 2018, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024), for the period 14 to 30 April 2015 (Ecoserv, 2015), for the period 10 to 14 April 2017 (Ecoserv, 2017), and for the period 10 to 21 April 2018 (Ecoserv, 2018) are shown in **Error! Reference source not found.**. Overall, the grand mean recorded during the 2025 survey for the period 10 to 30 April is similar to that recorded during the 2013–2024 surveys, but lower than that recorded in 2008, 2009 and 2012.

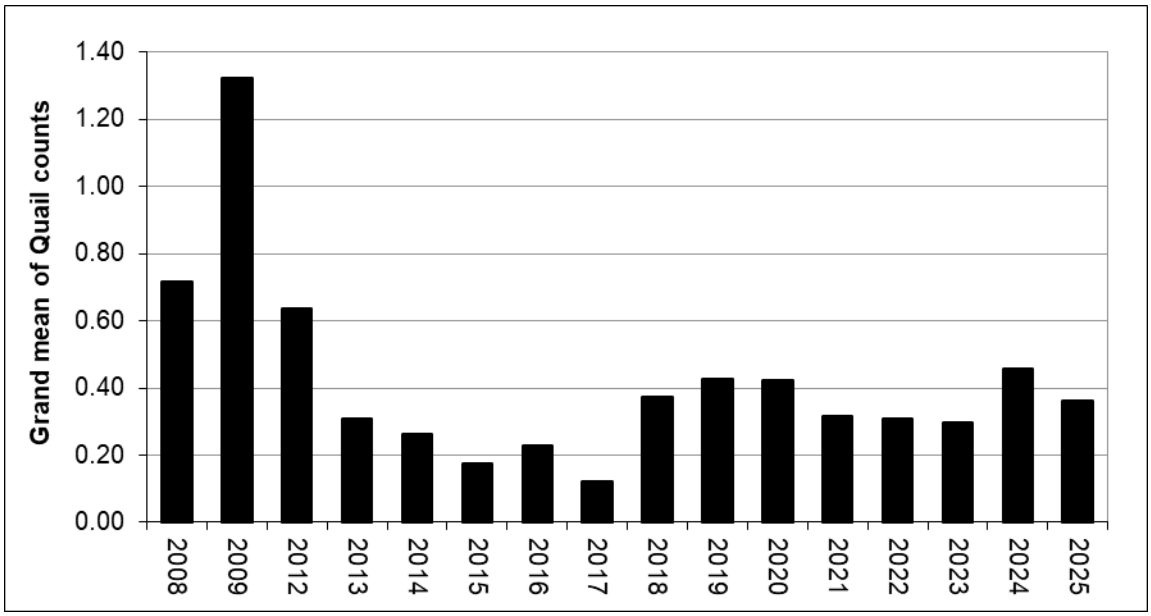


Figure 13: Grand mean of Common Quail counts for data from the period 10 to 30 April recorded in spring 2025 and spring 2008, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024), together with the grand mean for data from the period 14 to 30 April recorded in spring 2015 (Ecoserv, 2015), from the period 10 to 14 April recorded in spring 2017 (Ecoserv, 2017), and from the period 10 to 21 April recorded in spring 2018 (Ecoserv, 2018).

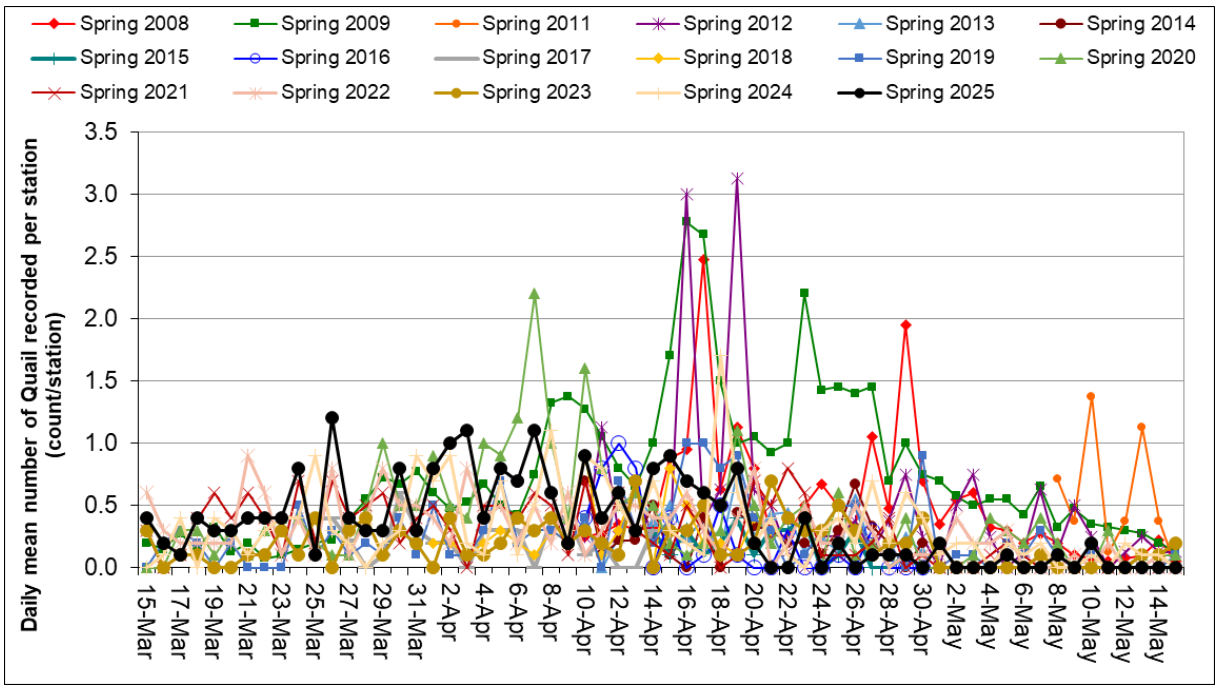


Figure 14: Daily mean counts of Common Quail per station (= site) recorded during the spring 2025 survey held between 15 March and 15 May, together with values of the same statistic for spring 2008, 2009 (Thomaidis, nd), 2012, 2013, 2014, 2016, 2019, 2020, 2021, 2022, 2023 and 2024 (Ecoserv, 2012; 2013; 2014; 2016; 2019; 2020; 2021; 2022; 2023; 2024).

10.11 The total influx of Common Quail was estimated for the whole area of the Maltese Islands using the recorded area surveyed for Quail at each site. However, such an estimate requires the following assumptions: (i) the rate of Quail settling at coastal sites (where the survey was carried out) is equal to that at inland locations, and (ii) the total area used to estimate the migration count does not include areas where settlement of Quail cannot occur in practice. Since Quail tend to migrate to inland sites, settling of Quail in coastal areas will likely be less than or equal to that in inland regions, but not greater, meaning that the estimated total may be an underestimate. The use of only coastal sites is still justified since these are more likely to serve as short-term stopover sites immediately following a migratory flight than inland locations; thus, including inland locations may result in an overestimation of the total influx due to repeated counting of resident Quails.

10.12 To ensure that the total area used to estimate the migration count does not include regions within which Quail do not normally settle, even though some birds may fly over urbanized areas, the total area was calculated as the sum of agricultural areas (161.5 km^2), forested areas (2.1 km^2) and areas of natural vegetation (57.8 km^2); this amounts to 221.4 km^2, representing 72% of the 315 km^2 total area of the Maltese Islands (land cover data source: MEPA, 2010). The mean (± SD) daily counts and estimated total influx of birds per day are shown in Table 10. Based on these data, extrapolation translates to a total influx of Common Quail during 15 March to 15 May 2025 of 187,063 individuals, or some 3,017 Quail per day. However, as emphasised in the reports of previous surveys (Ecoserv, 2011; 2012; 2013; 2014; 2015; 2016; 2017; 2018; 2019; 2020; 2021; 2022; 2023; 2024), such an estimate must be treated with utmost caution, given the relatively small number of field sites used on any one day and that counts were not made daily at each site, such that only a very small portion of the total area of potential habitat in the Maltese Islands was sampled.

Table 10 - Estimated total influx of Common Quail in the 2025 study period.

Date	Estimated Daily Influx
15-Mar-25	4043
16-Mar-25	1390

Date	Estimated Daily Influx
17-Mar-25	803
18-Mar-25	4026
19-Mar-25	2085
20-Mar-25	2410
21-Mar-25	4026
22-Mar-25	2780
23-Mar-25	3223
24-Mar-25	8085
25-Mar-25	697
26-Mar-25	9670
27-Mar-25	4026
28-Mar-25	2085
29-Mar-25	2417
30-Mar-25	7751
31-Mar-25	2085
01-Apr-25	6446
02-Apr-25	9689
03-Apr-25	7625
04-Apr-25	3223
05-Apr-25	8085
06-Apr-25	4866
07-Apr-25	8864
08-Apr-25	6064
09-Apr-25	1390
10-Apr-25	7279
11-Apr-25	4026
12-Apr-25	4159
13-Apr-25	2417
14-Apr-25	8085
15-Apr-25	6276
16-Apr-25	5641
17-Apr-25	6040
18-Apr-25	3475
19-Apr-25	6470
20-Apr-25	2021
21-Apr-25	0
22-Apr-25	0
23-Apr-25	4043
24-Apr-25	0
25-Apr-25	1612
26-Apr-25	0
27-Apr-25	695
28-Apr-25	803
29-Apr-25	969
30-Apr-25	0
01-May-25	1606
02-May-25	0

Date	Estimated Daily Influx
03-May-25	0
04-May-25	0
05-May-25	1011
06-May-25	0
07-May-25	0
08-May-25	969
09-May-25	0
10-May-25	1612
11-May-25	0
12-May-25	0
13-May-25	0
14-May-25	0
15-May-25	0
Total	**187,063**

11. Comparison between migration study data and game reporting data

11.1 A comparative analysis of data from the monitoring study with bag data was undertaken. The bag dataset comprises the daily bag count of Turtle-dove (as reported by hunters through a telephone reporting system and the Game Reporting MT app) for the period 21 April to 04 May April 2025, and the daily bag count of Common Quail (as reported by hunters through a telephone reporting system and the Game Reporting MT app) for the period 14 April to 04 May 2025. It should be noted that the two sets of data were collected for different purposes and using very different methodologies; therefore, the magnitudes of values are not directly comparable. However, the temporal trends can be expected to follow similar patterns; that is, within the same season the periods when higher mean daily counts were recorded during the monitoring survey should broadly follow the days when higher numbers of Turtle-dove or Common Quail were caught (and reported in the bag data). Graphical representations of the mean or total daily counts made during the 2025 survey and the daily bag counts for the same period (21 April to 04 May 2025 or 14 April to 04 May 2025) for Turtle-dove and Common Quail were compared.

11.2 The daily bag counts indicating the number of Turtle-dove caught during the 2025 spring hunting season made during the 2025 survey are shown in **Error! Reference source not found.**. As already noted, the magnitudes of the bag counts and those of the total counts made in the 2025 survey are not directly comparable; hence the two sets of values are on different scales. Therefore, in **Error! Reference source not found.**, two separate y-axes are used: the bag count data is plotted on the left-side y-axis, whereas the counts from the 2025 survey are plotted on the right-side y-axis.

11.3 Overall, the general trend of daily counts made during the 2025 survey is of relatively similar counts between 21 April and 04 May with no appreciable peaks. The bag count data includes a similar trend of relatively similar counts between 21 and 01 May, followed by a progressive increase from 02 to 04 May, such that the bag count during the last day of the spring hunting season (04 May) was more than twice that recorded on most of the other days. Therefore, overall, there was a similar temporal trend of only small day to day variation in both the daily counts made during the 2025 survey and the bag count data until 01 May, but the latter showed a steady increase over the last three days with a significant peak in counts made on 04 May, whereas no such increase in daily counts made between 02 and 04 May was recorded during the 2025 survey.

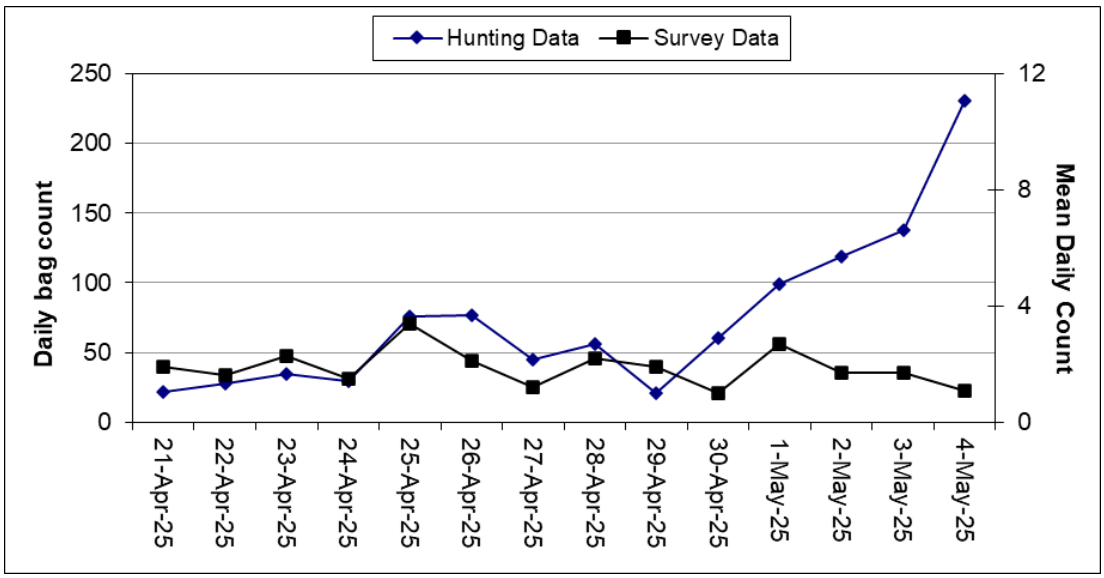


Figure 15: Daily bag count of Turtle Dove during 2025 (blue line; values on left-side y-axis), together with the mean daily counts recorded during the 2025 survey (black line; values on right-side y-axis), for the period 21 April to 04 May 2025.

11.4 The daily bag counts indicating the number of Common Quail caught during the 2025 spring hunting season are shown in **Error! Reference source not found.**. As already noted, the magnitudes of the bag counts and those of the mean/total counts made in the 2025 survey are not directly comparable; hence the two sets of values are on different scales. Therefore, in **Error! Reference source not found.** two separate y-axes are used: the bag count data is plotted on the left-side y-axis, whereas the counts from the 2025 survey are plotted on the right-side y-axis.

11.5 The daily counts made during the 2025 survey include day-to-day fluctuations, but the overall pattern is of similar counts recorded throughout the period 14 April to 04 May with marginally higher counts on 14–19 April. No overall trend of increase or decrease in daily survey counts is discernible over the rest of the survey period. The bag count data also included an overall pattern of similar counts recorded throughout the period 14 April to 04 May, with marginally higher counts on 19 and 20 April. Therefore, overall, there was a trend of similar counts between 14 April to 04 May in both the daily counts made during the 2025 survey and the bag count data, with marginally higher counts recorded on some days in mid-April.

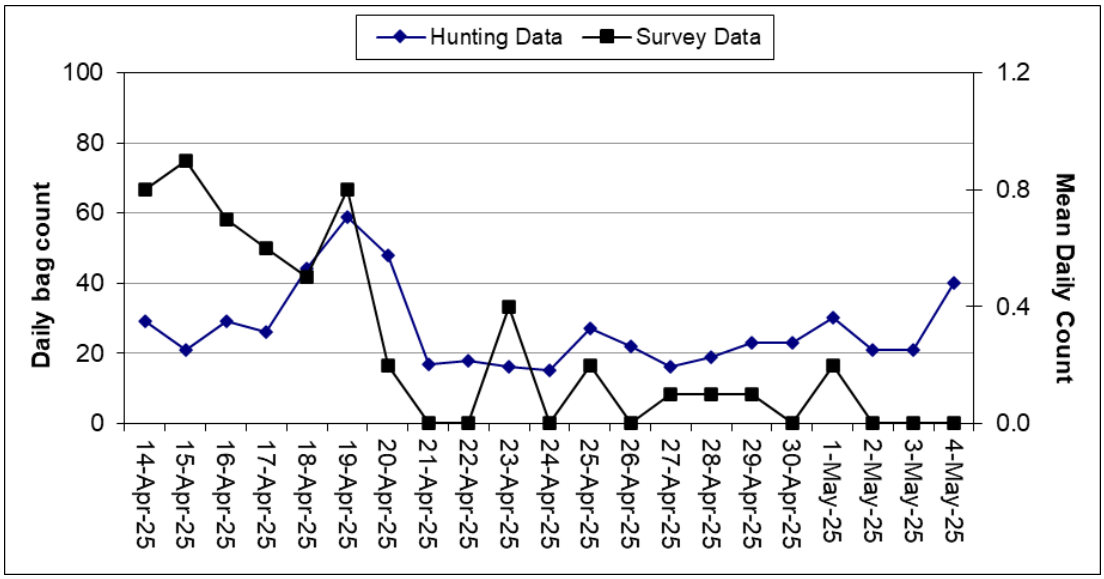


Figure 16: Daily bag count of Common Quail during 2025 (blue line; values on left-side y-axis), together with the mean daily counts recorded during the 2025 survey (black line; values on right-side y-axis), for the period 14 April to 04 May 2025.

12. Enforcement

12.1 The Framework Regulations stipulate that a minimum of seven (7) enforcement officers for every 1,000 licensed hunters are required to be deployed during hunting hours. A total of 8,001 hunters were issued with a spring hunting licence in 2025 and therefore a minimum of 56 enforcement personnel were needed in accordance with national legislation to supervise the derogation period. Out of the total special licences issued, a total of 88 special licences remained uncollected, thus 7,913 individuals were in possession of a special licence.

12.2 Field surveillance and patrols were deployed from within the Environment Protection Unit (EPU) of the Malta Police Force with additional support from the 11 district police areas and from the Armed Forces of Malta (AFM), the Compliance Team of the Wild Birds Regulation Unit (WBRU) and Environmental Rangers from Ambjent Malta.

12.3 Prior to commencement of the season, enforcement officers received specialised training delivered by officials of the Compliance Section of the Wild Birds Regulation. Six training sessions were held.. Officers who attended the training sessions as well as all officers participating in enforcement received detailed information through digital platforms, namely:

- The legal framework concerning the conservation of wild birds;
- Legal requirements pertaining to the spring hunting season;
- Monitoring and surveillance techniques and approaches;
- Basic species identification skills;
- Inspections;
- Hotspots and areas requiring particular attention; and
- Potential law enforcement evasion techniques deployed by poachers.

12.4 The objectives of training and enforcement operations are:

- To ensure continuous deployment presence in the countryside to deter any potential abuse from occurring in the first place;
- To ensure that no illegal targeting of species other than Quail and Turtle-dove occurs, and that any detected incidents of abuse are dealt with swiftly and effectively (that is, apprehension of suspects and gathering sufficient field evidence to enable prosecution);
- To ensure that the general prohibitions and parameters related to the open season are enforced (such as: no hunting in prohibited areas; outside permitted hours; using prohibited means like bird callers; semi-automatic or automatic weapons with a magazine capable of holding more than two rounds of ammunition; hunting without a valid spring hunting licence); and
- To ensure that specific regulations applicable to the spring hunting derogation are enforced (such as the game reporting obligation).

12.5 Specialised training sessions have been organised over the past years and enforcement statistics show that this training is demonstrating significant added value in terms of efficiency in enforcement action. Enforcement officers have also gained field experience which enables them to identify areas which require surveillance during particular days due to prevailing winds which affect migration and are also aware of the areas commonly frequented by hunters thus enabling targeted enforcement action.

12.6 As was also the case in previous years, the enforcement operation throughout the season deployed a mix of the following approaches and techniques:

a) **Vehicular patrols** by EPU, AFM and WBRU to ensure regular coverage of the entire Maltese countryside, with an emphasis on priority surveillance areas and hunting grounds;

b) **Foot patrols** by uniformed officers (both the AFM and EPU) within particular locations, especially those areas with difficult vehicular access. WBRU officers also accompanied uniformed officers during some of the foot patrols;

c) **Stationary observation posts** manned by **uniformed** and **plain-clothed** personnel, including WBRU officers. Stationary observation posts were located at vantage points within priority surveillance areas and hunting grounds;

d) **Systematic spot-checks on individual licensees and roadblocks** at strategic vehicular entry and exit points by Police. The objective of spot-checks is two-fold: (1) to detect the possession of illegally shot protected birds or other illegal material and (2) to enforce bag limit and real-time reporting requirements; and

e) Deployment of **covert surveillance** backed up by mobile units especially in response to large influxes of protected birds or to ensure sufficient surveillance of particular hotspots known for targeting of protected birds.

12.7 The Maltese authorities paid particular attention to collaboration with the numerous NGO volunteers who were present in the countryside during the season. These volunteers aided the overall enforcement effort by:

- Acting as a deterrent to illegal hunting by virtue of their presence in the countryside;
- Submitting vital day-to-day information about the presence of birds and alerting the authorities to the presence of high-risk species or high-risk sites such as roosting sites;
- Acting as ocular witnesses to illegal hunting incidents, and reporting such incidents to the authorities;
- Gathering of video/photographic evidence of poaching and making available such evidence to the enforcement authorities.

12.8 During the season, WBRU's Customer Care Branch received a number of calls related to suspected or alleged irregular activity. All reports were immediately passed on to enforcement personnel to ensure swift action against crime.

12.9 During inspections, police forces were responsible for ensuring the lawful operation of hunting practices. Police officers were, *inter alia*, instructed to:

- Verify that hunters were in possession of all the required documents;
- Verify that Quail and Turtle-doves caught were being immediately reported in accordance with regulations;
- Ensure compliance with the provisions of the Conservation of Wild Birds Regulations, the Framework Regulations and the Regulations opening the spring 2025 season (L.N. 73 of 2025 and L.N. 74 of 2025);
- Ensure that no species other than Quail and Turtle-dove, were being targeted;
- Ensure compliance with bag limits and time restrictions.

12.10 During the derogation period, between 14 April and 4 May 2025, there was a daily average of 56 police officers deployed during morning shift[5]. Between 14 April and 04 May 2025 after 12pm, there was a daily average of 21 police officers deployed. Any reports received past these shifts (i.e., at night), are attended by District Police, Rapid Intervention Unit or Mobile Squad as necessary.

12.11 In addition to the above complement, throughout the spring hunting season the Wild Birds Regulation Unit deployed three compliance officers with daily deployment consisting of two teams patrolling the countryside from 6:00am till 12:30pm. WBRU officers were tasked with vehicular patrols, foot patrols within public footpaths, stationary observations and surveillance

[5], Enforcement officers operated on shift basis

from vantage points. Moreover, 6 Environmental Rangers (Ambjent Malta) conducted patrols in terrestrial Natura 2000 Sites, other protected and scheduled areas, and public rural areas. These uniformed officers are tasked with monitoring and taking action against different types of environmental crime and also act as deterrent against illegal activities relating to hunting. These officers also report all illegalities detected directly to the EPU.

12.12 In addition to enforcement deployment by the authorities, 33 hunting marshals were deployed by the Federation for Hunting and Conservation – Malta (FKNK) to assist the authorities in surveillance, whilst Kaċċaturi San Ubertu (KSU) deployed 10 observers to assist the authorities in the detection and reporting of any observed illegalities. Furthermore, various volunteers from the Committee Against Bird Slaughter (CABS) and BirdLife Malta maintained a close watch for irregularities throughout the season. These officers also report all crime detected directly to the Police Force.

12.13 During the derogation period, between 14 April and 4 May 2025, when the season was open, field officers from the Environment Protection Unit and Gozo Police carried out 1,336 field inspections/ patrols. In addition, these officers conducted 909 spot-checks on individual hunters.

12.14 This enforcement effort cumulatively amounts to **2,245**[6] inspections and spot-checks during the open season (14 April till 04 May 2025). It is important to note that this enforcement effort does not include efforts of District police, Rapid Intervention Unit or Mobile Squad carried out past EPU / Gozo police shifts[7], enforcement efforts carried out by Ambjent Malta's Environmental Rangers[8] or hunting marshals deployed by NGOs. The maximum number of hunters active on any given day during the 2025 spring hunting season was 799 (refer to section 8). This equates to 79 more active hunters than the maximum number of hunters active on any given day during the previous (2024) spring hunting season. In terms of ratios, the enforcement effort in spring 2024 was two spot-checks for every hunter when the total number of hunters out in the field was highest, while in spring 2025 the ratio was higher with three spot-checks for every hunter.

[6] 1,336 field inspections / patrols, 909 spot-checks on individual hunters.

[8] Environmental Rangers work from Monday to Friday between 0630 – 1530 and on day-in-day-out shifts from 0630 – 1830.

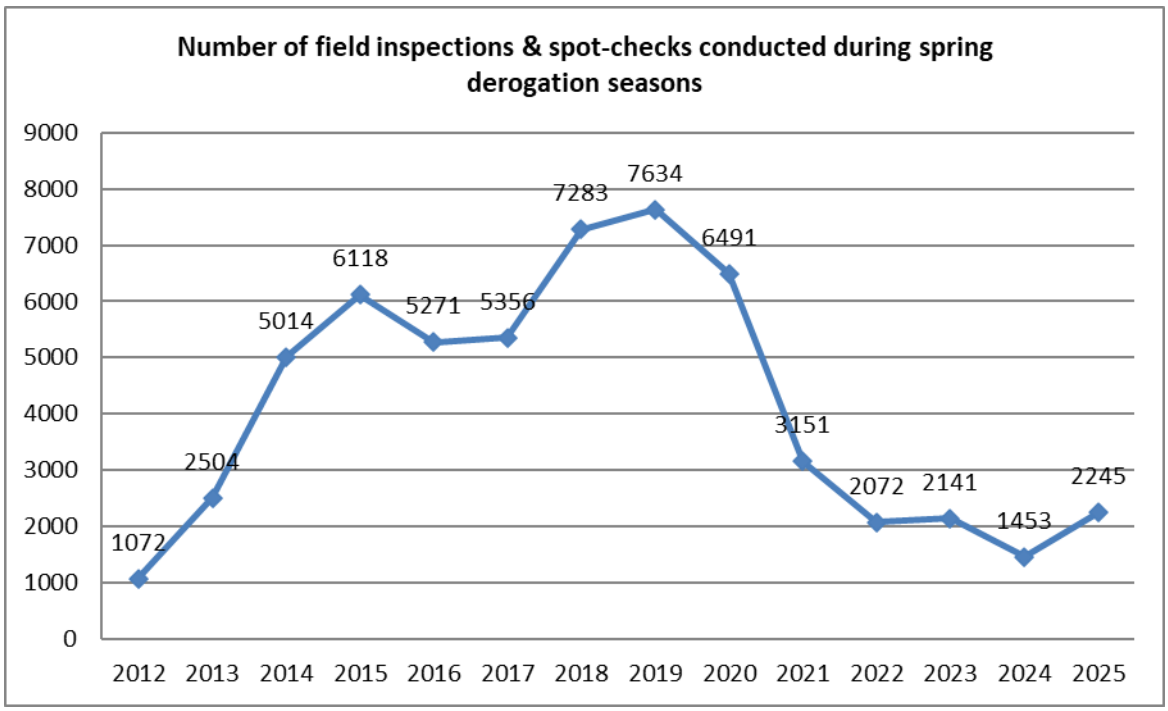


Figure 17: Comparison of number of field inspections and spot-checks performed during the spring hunting seasons over the past years.

12.15 Following the closure of the spring hunting season, the statutory enforcement deployment was maintained until Monday 12 May with a minimum of three officers per 1,000 licences in line with Regulation 6(4) of the Framework Regulations. Between the 05 May and 12 May, police carried out 223 field inspections / patrols.

12.16 In the course of these inspections and spot-checks, officers disclosed a total of 19 offences. These consist of 16 hunting offences which led to the issuing of 11 administrative fines and two court actions, and three trapping offences, one of which led to court action. In total, legal action has been taken against 14 persons, 13 for hunting offences and one for trapping offences. No further action could be taken on the remaining cases (three hunting, and two trapping) due to lack of information on the possible culprits which renders futile any attempt to press charges and secure a conviction.

12.17 All 11 administrative fines were issued to hunters in possession of a spring hunting special licence. Thus, this shows that 0.14% of the total number of persons with an active spring hunting special licence (7,913 licences) breached their special licence conditions and were fined administratively. These fines are in the process of being settled at WBRU office.

12.18 Court action has been initiated against two individuals holding a spring hunting special licence. This shows that 0.03% of the total number of persons with an active spring hunting special licence (7,913 licences) have breached their special licence conditions and will be charged in Court. Court action is ongoing.

12.19 Enforcement data shows that between administrative fines and court actions, 13 known persons have breached their special licence conditions which translates to 0.16% of all active spring hunting special licences (7,913 licences).

12.20 Statistics pertaining to daily enforcement deployment, daily number of field inspections and spot-checks conducted and nature of the offences detected are summarised in Table 11.

Table 11 - Enforcement deployment and offences detected during 2025 spring hunting season.

Date	Number of officers deployed 0500-1500 (EPU / District / AFM)	Number of officers deployed 1500-2100 (EPU / District / AFM)	Number of field inspections conducted (visits to specific areas)	Number of spot-checks on individual hunters[9]	Offences detected (number of cases and nature of offence)	Number of persons charged and action taken
14/04/2025	54	20	38	35	0	0
15/04/2025	56	20	35	35	0	0
16/04/2025	53	22	44	40	0	0
17/04/2025	56	23	52	32	0	0
18/04/2025	55	20	59	54	1 Hunting within prohibited distances[10]	1 Administrative fine
19/04/2025	57	22	59	29	1 Illegal shooting of protected birds[11]	1 Court action
20/04/2025	55	22	61	57	0	0
21/04/2025	60	22	80	48	2 Hunting within prohibited distances[12]	2 Administrative fines
22/04/2025	52	20	83	52	1 Hunting within prohibited distances[13], 1 Use of illegal means[14]	1 Court action
23/04/2025	61	22	52	43	0	0
24/04/2025	59	24	55	46	1 Failure to report birds caught[15] 1 Illegal Trapping[16], 1 Use of illegal means[17]	1 Administrative fine
25/04/2025	56	20	65	38	2 Hunting within prohibited distances[18] 1 Use of illegal means[19] 1 Illegal Trapping[20]	2 Administrative fines
26/04/2025	57	24	52	44	3 Hunting within prohibited distances[21]	3 Administrative fines
27/04/2025	55	20	55	45	0	0
28/04/2025	53	19	49	49	0	0
29/04/2025	54	22	55	45	0	0
30/04/2025	56	19	54	57	0	0
01/05/2025	53	17	46	48	0	0
02/05/2025	54	16	52	34	0	0
03/05/2025	58	21	33	34	2 Use of illegal means[22]	1 Administrative fine 1 Court action

[9] Including road checks.
[10] Case refers to an individual who was found hunting while within 200m from an inhabited area (170m) in Marsaskala. The hunter was issued with an administrative fine of €250.
[11] Case refers to an individual caught shooting a Eurasian Turtle-dove (*Streptopelia turtur*) during closed season in Miżieb. Police seized all hunting equipment, special licence and the illegally shot bird and issued charges against the individual.
[12] Cases refer to two individuals who were found hunting while within 200m from an inhabited area (150m) in Swieqi. The hunters were issued with an administrative fine of €250.
[13] Case refers to an individual who was found hunting while within less than 150m from an inhabited area (90m) in Rabat. Police seized all hunting equipment, special licence and issued charges against the individual.
[14] Case refers to the discovery of an unattended birdcaller in Qala. The birdcaller was seized by police however no legal action could be taken because the culprit remained unknown to the police.
[15] Case refers to an individual who failed to declare a hunted European Turtle-dove (*Streptopelia turtur*) in Rabat. The hunter was issued with an administrative fine of €50.
[16] Case refers to an unattended trapping site of unknown owner in Rabat. Police seized all trapping paraphernalia however no further legal action could be taken because the culprit remained unknown to the Police.
[17] Case refers to the discovery of an unattended birdcaller in Għasri. The birdcaller was seized by police however no legal action could be taken because the culprit remained unknown to the police.
[18] Cases refer to two individuals who were found hunting while within 200m from an inhabited area (150m) in Swieqi. The hunters were issued with an administrative fine of €250.
[19] Case refers to the discovery of an unattended birdcaller in Siġġiewi. The birdcaller was seized by police however no legal action could be taken because the culprit remained unknown to the police.
[20] Case refers to an unattended trapping site of unknown owner in Armier. Police seized all trapping paraphernalia however no further legal action could be taken because the culprit remained unknown to the Police.
[21] Cases refer to three individuals who were found hunting while within 200m from an inhabited area, (180m and 160m in Żejtun respectively) and (155m in Gudja). The hunters were issued with an administrative fine of €250.
[22] One of the cases refers to an individual caught using pre-recorded Turtle-dove calls. Police seized the birdcaller and the hunter was issued with an administrative fine of €250. Another case refers to an individual caught using mist-nets in Mellieħa. The Police seized all trapping paraphernalia and initiated legal action against the individual.

Date	Number of officers deployed 0500-1500 (EPU / District / AFM)	Number of officers deployed 1500-2100 (EPU / District / AFM)	Number of field inspections conducted (visits to specific areas)	Number of spot-checks on individual hunters[9]	Offences detected (number of cases and nature of offence)	Number of persons charged and action taken
04/05/2025	57	21	41	44	1 Hunting within prohibited distances[23]	1 Administrative fine
CLOSED SEASON						
05/05/2025	24	10	22	0	0	0
06/05/2025	14	12	18	0	0	0
07/05/2025	11	9	32	0	0	0
08/05/2025	12	7	34	0	0	0
09/05/2025	15	11	41	0	0	0
10/05/2025	11	7	20	0	0	0
11/05/2025	15	11	23	0	0	0
12/05/2025	14	9	26	0	0	0
Total			**1,336[24]**	**909[25]**	**19**	**14**

[23] Case refers to an individual who was found hunting while within 200m from an inhabited area (180m) in Siġġiewi. The hunter was issued with an administrative fine of €250.
[24] 1,120 during open season and 216 during closed season.
[25] All during open season.

Table 12 below compares the number and nature of the offences detected on which legal action was taken during 2025 spring hunting season with the corresponding statistics for the previous seasons.

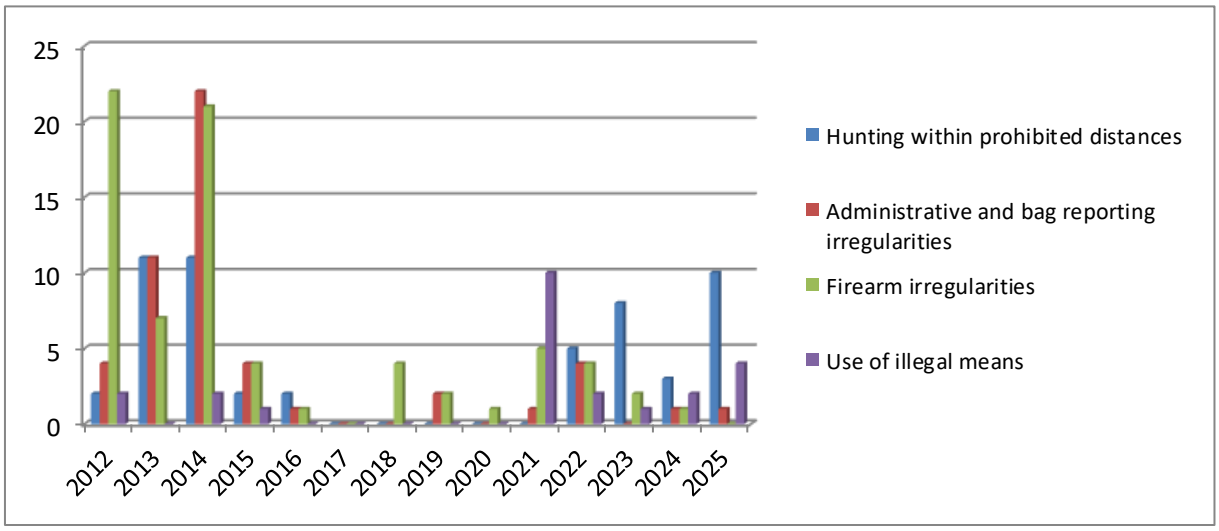


Figure 18: Analysis of the trends pertaining to the detection and legal action on minor offences during the spring hunting seasons over the past years.

(and **Error! Reference source not found.** illustrate the trends pertaining to detection and legal action of minor

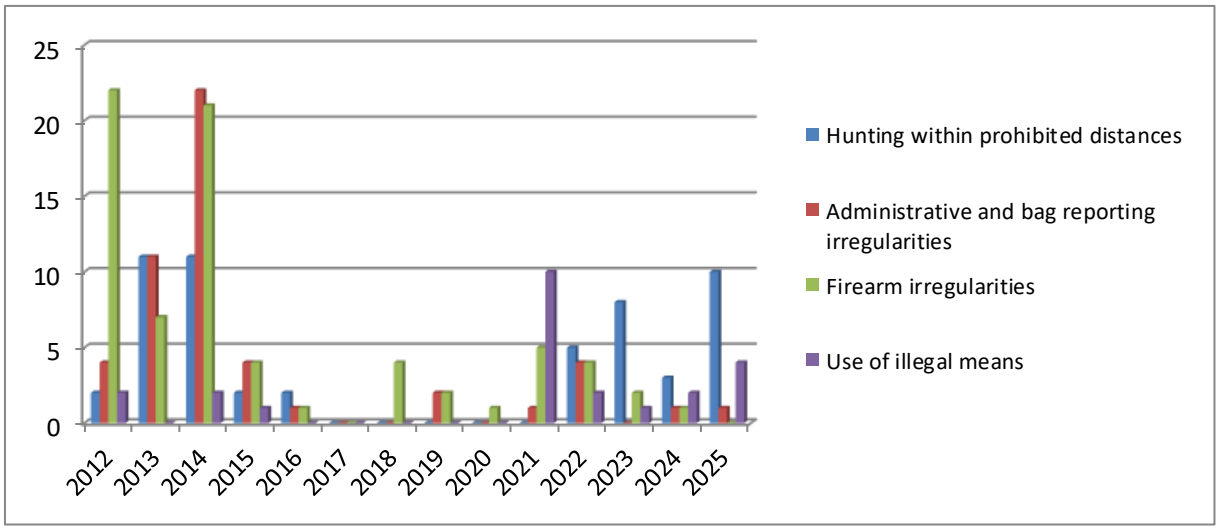


Figure 18: Analysis of the trends pertaining to the detection and legal action on minor offences during the spring hunting seasons over the past years.

12.21) and major (**Error! Reference source not found.**) offences during the period of spring hunting derogation over the past ten years.

Table 12 - Comparison of offences detected on which legal action was taken during 2012 – 2025 spring hunting seasons.

Offences detected on which legal action was taken during 2012 – 2025 spring hunting seasons														
Offences	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**
Hunting within prohibited distances	2	11	11	2	2	0	0	0	0	0	5	8	3	10

Administrative and bag reporting irregularities	4	11	22	4	1	0	0	2	0	1	4	0	1	1
Firearm irregularities	22	7	21	4	1	0	4	2	1	5	4	2	1	0
Use of illegal means	2	0	2	1	0	0	0	0	0	10	2	1	2	4
Illegal trapping of protected birds	11	3	5	2	2	4	4	0	0	8	2	1	1	0
Illegal shooting of protected birds	2	3	2	3	1	1	2	1	4	7	0	0	2	1
Possession of protected species	5	1	1	2	0	0	3	0	0	0	0	0	0	0
Hunting in protected areas	0	4	2	0	0	0	0	0	0	0	0	0	1	0
Hunting without a valid licence	10	10	2	0	1	0	1	1	6	2	2	0	1	0
Hunting during the closed season	6	3	1	0	1	0	2	0	2	1	1	0	2	0
Conspiracy of breaking the law	0	0	0	0	0	0	1	0	0	0	0	0	0	0
Total offences against which legal action was taken	**64**	**53**	**69**	**18**	**9**	**5**	**17**	**6**	**13**	**34**	**20**	**12**	**14**	**14**

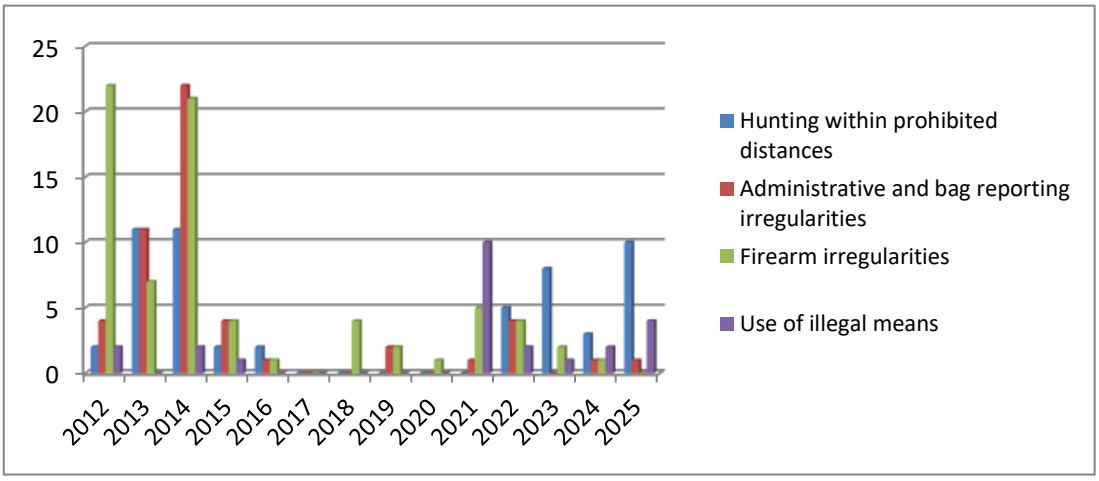


Figure 18: Analysis of the trends pertaining to the detection and legal action on minor offences during the spring hunting seasons over the past years.

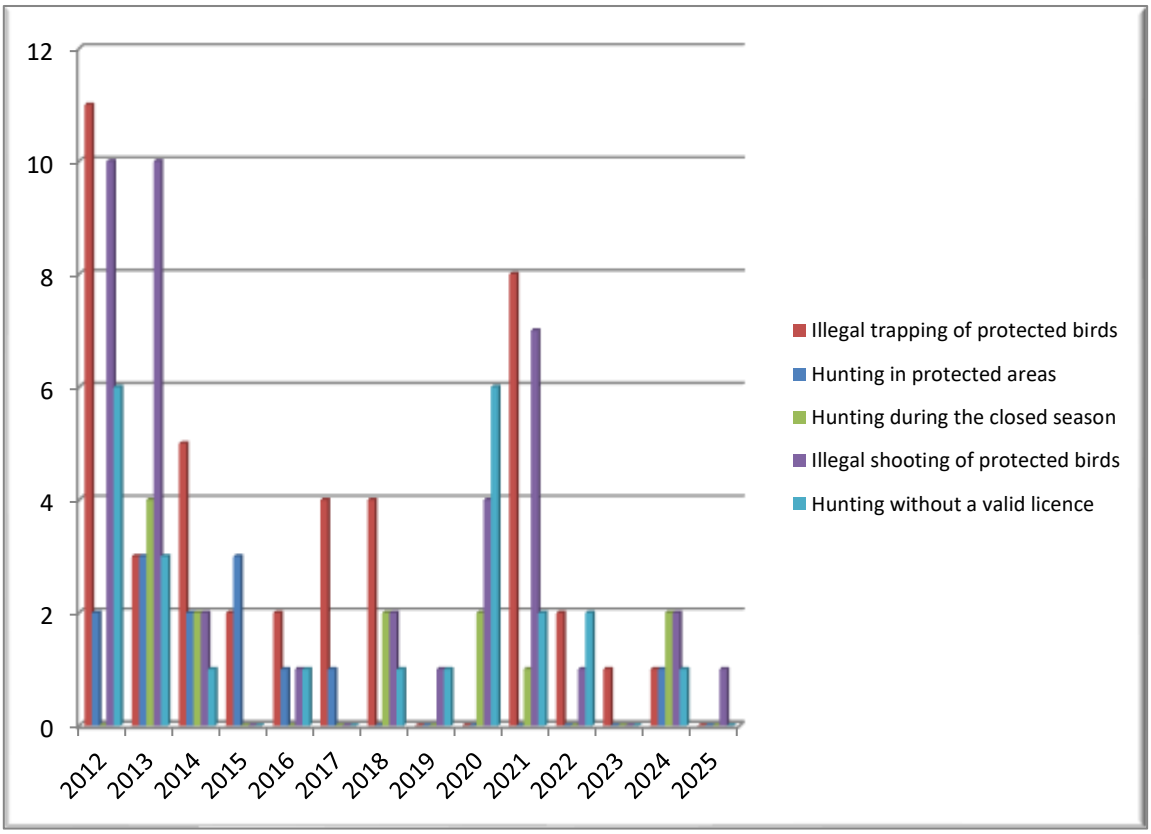


Figure 19: Analysis of the trends pertaining to the detection and legal action on major offences during the spring hunting seasons over the past years.

12.22 Table 13 provides a comparison between the total number of birds confirmed to have been illegally shot during the 2024 and 2025 spring hunting seasons. It is to be noted that dates of the seasons vary. Spring hunting season 2024 opened on the 10 April and closed on the 30 April 2024 whilst spring hunting season for the year 2025 opened on the 14 April and lasted till the 4 May 2025.

Table 13 - Birds confirmed to have been illegally shot during the 2024 and 2025 spring hunting seasons.

2024 spring hunting season (10/04/2024 – 30/04/2024)			2025 spring hunting season (14/04/2025 – 04/05/2025)		
Date of retrieval	**Species**	**Retrieved from**	**Date of retrieval**	**Species**	**Retrieved from**
10/04/2024	-	-	10/04/2025		
11/04/2024	-	-	11/04/2025		
12/04/2024	Eurasian Marsh Harrier (*Circus aeruginosus*)	Qajjenza	12/04/2025		
13/04/2024	-	-	13/04/2025		
14/04/2024	-	-	14/04/2025	-	-
15/04/2024	House Martin (*Delichon urbicum*)	Baħrija	15/04/2025	-	-
16/04/2024	-	-	16/04/2025	-	-
17/04/2024	Common Cuckoo (*Cuculus canorus*)	Ħas-Saptan	17/04/2025	Eurasian Collared-dove (*Streptopelia decaocto*)	Wardija
	Night Heron (*Nycticorax nycticorax*)	Wied Qirda			
18/04/2024	Eurasian Marsh Harrier (*Circus aeruginosus*)	Marsaxlokk	18/04/2025	Common Kestrel (*Falco tinnunculus*)	Balzan
	Eurasian Marsh Harrier (*Circus aeruginosus*)	Birżebbuġia		Eurasian Hobby (*Falco Subbuteo*)	Tarxien
				European Bee-eater (*Merops apiaster*)	Luqa
	Eurasian Marsh Harrier (*Circus aeruginosus*)	Marsaxlokk		European Turtle-dove (*Streptopelia turtur*)	Miżieb
19/04/2024	-	-	19/04/2025	-	-
20/04/2024	-	-	20/04/2025	-	-
21/04/2024	Eurasian Marsh Harrier (*Circus aeruginosus*)	Rabat	21/04/2025	European Nightjar (*Caprimulgus europaeus*)	Miżieb
22/04/2024	European Nightjar (*Caprimulgus europaeus*)	Birżebbuġia	22/04/2025	European Nightjar (*Caprimulgus europaeus*)	Wardija

2024 spring hunting season (10/04/2024 – 30/04/2024)			2025 spring hunting season (14/04/2025 – 04/05/2025)		
	European Bee-eater (*Merops apiaster*)	Marsalforn			
	Squacco Heron (*Ardeola ralloides*)	Riviera			
23/04/2024	Eurasian Hobby (*Falco Subbuteo*)	Miżieb	23/04/2025	Night Heron (*Nycticorax nycticorax*)	Birżebbugia
	European Bee-eater (*Merops apiaster*)	Birżebbuġia		Great Cormorant (*Phalacrocorax carbo*)	Armier
24/04/2024	-	-	24/04/2025	Common Kestrel (*Falco tinnunculus*)	Nadur
25/04/2024	Eurasian Marsh Harrier (*Circus aeruginosus*)	Santa Luċija	25/04/2025	-	-
	Common Kestrel (*Falco tinnunculus*)	Qormi			
	Common Cuckoo (*Cuculus canorus*)	Ħal Safi			
26/04/2024	Common Kestrel (*Falco tinnunculus*)	Qormi	26/04/2025	-	-
	Common Kestrel (*Falco tinnunculus*)	Qormi			
27/04/2024	European Bee-eater (*Merops apiaster*)	Żejtun	27/04/2025	-	-
28/04/2024	Common Kestrel (*Falco tinnunculus*)	Żebbuġ	28/04/2025	Common Kestrel (*Falco tinnunculus*)	Nadur
				Eurasian Scops owl (*Otus scops*)	Aħrax tal-Mellieħa
29/04/2024	-	-	29/04/2025	-	-
30/04/2024	Common Kestrel (*Falco tinnunculus*)	Nadur	30/04/2025	-	-

2024 spring hunting season (10/04/2024 – 30/04/2024)			2025 spring hunting season (14/04/2025 – 04/05/2025)		
	European Bee-eater (*Merops apiaster*)	Pembroke			
01/05/2024			01/05/2025	-	-
02/05/2024			02/05/2025	-	-
03/05/2024			03/05/2025	Eurasian Marsh Harrier (*Circus aeruginosus*)	Għarb
				Eurasian Collared-dove (*Streptopelia decaocto*)	Birkirkara
04/05/2024			04/05/2025	Black-winged stilt (*Himantopus himantopus*)	Marsascala
				Cattle Egret (*Bubulcus ibis*)	Għargħur
22			**16**		

12.23 As shown in Table 13 above, 22 illegally shot birds were reported during the 2024 spring hunting season (10 April – 30 April 2024) whilst during the 2025 spring hunting season (14 April – 4 May 2025, there were 16 illegally shot birds. The ratio of illegally shot birds for the open seasons during both years, is 0.73:1 (2025:2024). The Eurasian Marsh Harrier followed by the Common Kestrel constituted the majority of casualties in spring 2024, whilst similar to previous years the Common Kestrel was the most illegally shot species during the 2025 spring hunting season.

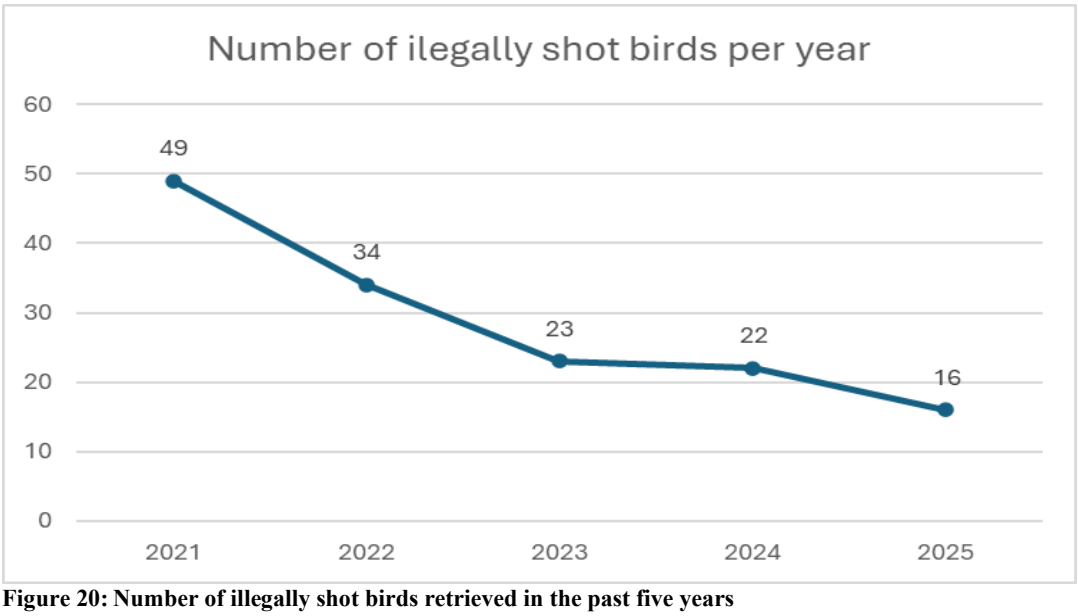


Figure 20: Number of illegally shot birds retrieved in the past five years

12.24 **Error! Reference source not found.** above shows the number of illegally shot birds during the spring hunting season over the past five years. It is evident that there is a decline in the number of illegally shot protected birds during recent years.

12.25 As detailed in Table 11, in respect of the offences detected during the 2025 spring hunting season, court action is being taken against three persons. One person for hunting of protected species, a person for hunting within 150m of an inhabited area, and a person for the illegal use of mist-nets. In addition, 11 administrative fines were issued, nine persons for carrying of loaded/unloaded firearm that was not in its case within 200 metres from any town or village or other inhabited area, one person for the illegal use of bird caller, and one person for not reporting caught game.

12.26 The minimum enforcement deployment as set out in Framework Regulations was met by enforcement authorities and exceeded when taking into consideration the number of marshals, Ambjent Malta enforcement officers and observers employed by NGOs. Additionally, the absolute majority of offences detected were effectively investigated and prosecuted.

13. Conclusions

13.1 The application of the 2025 spring hunting derogation was preceded by a series of analyses that considered all relevant legal, scientific and technical aspects pertaining to this derogation, as well as by an open and transparent discussion with stakeholders.

13.2 As a result of these processes, the decision to apply the derogation was made after ascertaining that there is no other satisfactory solution, and that the following critical prerequisites will be met:

- The derogation will satisfy all the relevant requirements of the Birds Directive, and specifically the parameters stipulated in Articles 9(1) and 9(1)(c) thereof.

- The actual implementation of the derogation on the ground will ensure that the relevant legal parameters will be respected in the field through an elaborate and robust enforcement regime.

13.3 Throughout the period of this derogation, the priority of the Maltese authorities was to ensure that all parameters of the derogation were met in practice. Although the decline in the number of illegally shot protected birds during recent years is evident, both during and on the margins of the spring hunting season, further preventive measures are still required to totally curb this illegality. In this regard, the Maltese authorities are actively working to address this issue by, inter alia, ensuring effective enforcement to deter, detect and prosecute bird-related crime and by addressing the key motives for IKB-related crime, including illegal taxidermy.